

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

FILED

MAY 13 2013

DEANA AVERSMAN
LAFAYETTE CO. CIRCUIT CLERK

IN RE: ADMINISTRATIVE MATTER

RE: WILLIAM WINDSOR

Case No. 4:13-MC-09008-FJG

ORDER

On March 20, 2013, William Windsor contacted this Court requesting approval to file a complaint in Lafayette County, Missouri. The complaint is approximately 60 pages and seeks to sue a former volunteer of Windsor's company and the former volunteer's boyfriend for defamation, infliction of emotional distress, and tortious interference with contract or business relations. Windsor sought this Court's permission pursuant to an order issued by Judge Thomas Thrash in the Northern District of Georgia due to vexatious litigation on July 15, 2011 which states:

Plaintiff William Windsor and any parties acting in concert with him or at his behest are PERMANENTLY ENJOINED from filing any complaint or initiating any proceeding, including any new lawsuit or administrative proceeding, in any court (state or federal) or agency in the United States without first obtaining leave of a federal district court in the district in which the new complaint or proceeding is to be filed. In seeking such leave, the Plaintiff must present any such court with a copy of this Order. If the lawsuit or administrative proceeding names federal judges or court employees, the Plaintiff must also tender a \$50,000.00 cash bond or a \$50,000.00 corporate surety bond sufficient to satisfy an award of Rule 11 sanctions since such actions are presumably frivolous. Failure to obey this Order, including by attempting to avoid or circumvent the intent of this Order, will be grounds for sanctions including contempt.

Windsor v. Hatten, Case No. 1:11-CV-1923-TWT, slip op. at 2-3 (N.D. Ga. July 15, 2011).

After careful consideration of Windsor's request and all applicable law, this Court hereby **FINDS** that Windsor may file his state court action subject to any state court rulings to the contrary. Plaintiff should include with his Petition an attachment of the order referenced above.

The Clerk of the Court shall send this order via regular and certified mail to the following: William Windsor P.O. Box 681236 Marietta, GA 30068 and William Windsor 3924 Lower Roswell Road Marietta, GA 30068.

IT IS SO ORDERED.

Date: April 12, 2013
Kansas City, Missouri

S/ FERNANDO J. GAITAN, J R.
Fernando J. Gaitan, Jr.
Chief United States District Judge

Exhibit

A

William M. Windsor

110 E Center Street #1213 * Madison, SD 57042 * Cell: 770-578-1094 * nobodies@att.net

November 21, 2013

Chief District Judge Sidney A. Fitzwater
United States District Court for the Northern District of Texas
1100 Commerce St., Room 1452
Dallas, TX 75242

Dear Judge Fitzwater:

Enclosed is a proposed legal action for your approval.

Judge Thomas W. Thrash of the Northern District of Georgia allegedly entered an order requiring that I provide copies of any lawsuits that I plan to file to a federal judge for a frivolity review.

I believe the alleged order of Judge Thrash is a void order for a host of reasons, but I am still attempting to comply.

Please review the enclosed. I would appreciate an order saying this is okay to file, but if I do not hear from you by December 7, I will assume that you did not disapprove. There is nothing whatsoever frivolous in the enclosed legal action.

Sincerely,

A handwritten signature in black ink, appearing to read "William M. Windsor", with a stylized, cursive script.

William M. Windsor

CAUSE NO. _____

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com	§	
Brannon Bridge, Curtis Butler,	§	_____ JUDICIAL DISTRICT
Sean Boushie, Sean D. Fleming,	§	
Albert J. Fiorini, Jeff Swiney,	§	
Lisa Jones, Sam Round,	§	
and Joey Does 1-1000,	§	
Defendants	§	DALLAS COUNTY, TEXAS
	§	

VERIFIED PETITION

William M. Windsor ("WINDSOR" or "PLAINTIFF") hereby files his VERIFIED PETITION. Windsor shows the Court as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over the Defendants and over the subject matter of this action. An actual controversy exists within this Court's jurisdiction.

2. Pursuant to Texas Civil Practice and Remedies Code, all lawsuits may be brought "(1) in the county in which all or a substantial part of the events or omissions giving rise to the claim occurred; (2) in the county of defendant's residence at the time the cause of action accrued if defendant is a natural person...."

3. Venue in Dallas County Texas is proper in this cause because Defendant Megan Van Zelfden ("MVZ") resides in Dallas County Texas, has a place of business or of employment in Dallas County Texas; and because a substantial part of the causes of action arose in Dallas County Texas.

4. Texas Civil Practice and Remedies Code also provides that "In a suit in which the plaintiff has established proper venue against a defendant, the court also has venue of all the defendants in all claims or actions arising out of the same transaction, occurrence, or series of transactions or occurrences." Therefore, this is the proper venue for each of the DEFENDANTS.

5. Each of the DEFENDANTS has had significant contacts with Dallas County Texas.

6. Texas Civil Practice and Remedies Code Sec. 15.017 provides: "A suit for damages for libel, slander, or invasion of privacy shall be brought and can only be maintained in the county in which the plaintiff resided at the time of the accrual of the cause of action, or in the county in which the defendant resided at the time of filing suit, or in the county of the residence of defendants, or any of them, or the domicile of any corporate defendant, at the election of the plaintiff." Defendant Megan Van Zelfden resides in Dallas County Texas.

7. The Texas Long Arm Statute provides jurisdiction over any party who commits a tort in whole or in part in this state. The DEFENDANTS all committed torts in whole or in part in Texas. The Joeyisalittlekid.blogspot.com website is Texas-based. Megan Van Zelfden is believed to be the owner and primary operator of the Joeyisalittlekid organization and website. On December 3, 2012, a Collin County court ordered Megan Van Zelfden to remove information from a Joeyisalittlekid website in litigation brought against her. All of the DEFENDANTS have frequented the Joeyisalittlekid website, which they call a clubhouse, and they interact with published stories and comments by Megan Van Zelfden, Brannon Bridge, Curtis Butler, and other Texas members of the organization. The Joeyisalittlekid organization and website began with a focus on Ellis County Texas and a Texas resident and Texas prison inmate named Joey

Dauben. The Texas connections of the DEFENDANTS have been continuous for years. This makes all of the parties subject to jurisdiction in this Court.

8. This matter is about a conspiracy and cyberstalking by a large number of people. A conspiracy has existed. The object to be accomplished was to defame, libel, slander, harass, cyberstalk, falsely charge the PLAINTIFF with felonies, and damage the PLAINTIFF. The conspiracy was operated from Texas where joeyisalittlekid exists and operates. The co-conspirators have had all of their contacts with Texas, and they knew or should have known that substantial acts in furtherance of the conspiracy took place in Texas. The acts in furtherance of a conspiracy are attributable to all of the co-conspirators. Venue in a civil conspiracy suit in Texas may lie in any county in which an act in furtherance of the conspiracy took place. Texas law provides jurisdiction when a plaintiff establishes the following elements: (1) that a conspiracy existed to deprive plaintiff of his rights; (2) that defendant was a party to the conspiracy; and (3) that substantial acts in furtherance of the conspiracy of which defendant was aware or should have been aware took place in the forum state. All of the DEFENDANTS established and maintained contact with the State of Texas every time they participated in posting and commenting on the Joeyisalittlekid.blogspot.com, participating in the joeyisalittlekid radio show, and producing videos for joeyisalittlekid. The extent of the contact between the conspiracy and Texas support an exercise of jurisdiction. Substantial acts in furtherance of the conspiracy were performed in Texas and the co-conspirators knew or should have known that acts would be performed in the forum state.

9. The non-resident DEFENDANTS, through their relationships with the Texas resident Defendants have purposefully availed themselves of the privilege of conducting activities within the State of Texas. Non-resident Defendants knew or should have known that

the conspiracy was directed toward the State of Texas, of the acts to be committed in Texas, and the impact in Texas of acts done elsewhere in furtherance of the conspiracy.

10. DEFENDANTS have committed torts within the State of Texas. DEFENDANTS have had sufficient contacts with Texas that it would not offend due process to compel them to defend themselves in Texas courts with respect to the underlying cause.

11. All of the DEFENDANTS conspired with JOEYISALITTLEKID, Megan Van Zelfden, and others to defame the PLAINTIFF. The DEFENDANTS made false statements that they knew were false, that they were advised were false, and they made those false statements and continued to make those false statements to damage the PLAINTIFF. The DEFENDANTS had a duty to not libel, slander, defame, harass, stalk, invade the privacy, or conspire with others to damage the PLAINTIFF, and they did all of the above. The DEFENDANTS had a duty to protect PLAINTIFF from injury. The DEFENDANTS failed to protect the PLAINTIFF. The PLAINTIFF was injured as a result. The DEFENDANTS have an obligation to abide by the law, and they failed to do so. The PLAINTIFF's injuries were caused by the DEFENDANTS.

PARTIES

12. Plaintiff William M. Windsor ("WINDSOR" or "PLAINTIFF") is an individual whose address is 110 E Center Street #1213, Madison, SD 57719, telephone: 770-578-1094, email: nobodies@att.net.

13. Defendant Joeyisalittlekid ("JOEYISALITTLEKID") is an entity that does not have a known address. JOEYISALITTLEKID does not appear to be registered as a legal entity; does not appear to have filed an assumed name certificate; and does not appear to have designated an agent for service of process anywhere in the United States. But JOEYISALITTLEKID operates a website, a radio program, and has a virtual clubhouse where its

members meet. The Texas Secretary of State is an agent for service of process or complaint on a nonresident who is required by statute to designate or maintain a resident agent or engages in business in this state, but has not designated or maintained a resident agent for service of process. JOEYISALITTLEKID may be served at Secretary of State, State of Texas, 1100 Congress, Capitol Bldg., Room 1E.8, Austin, Texas 78701.

14. Defendant Joeysisalittlekid.blogspot.com ("BLOGSPOT") is an entity whose address is c/o Google, 1600 Amphitheatre Parkway, Mountain View, CA 94043. The registered agent for Google is CSC – Lawyers Incorporating Service, 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95803.

15. Defendant Megan Van Zelfden ("MVZ") is an individual whose address is 6445 Love Drive #2041, Irving, TX 75034, telephone: 469-298-0890.

16. Defendant Brannon Bridge ("BRIDGE") is an individual whose address is 3 Maree Court, Waxahachie, TX 75065, email: branbri@aol.com.

17. Defendant Curtis Butler ("BUTLER") is an individual whose address is 4604 Lilac Ln, Victoria, TX 77904, email: balchspringsbeacon@gmail.com.

18. Defendant Sean Boushie ("BOUSHIE") is an individual whose address is 570 Grandview Drive, Stevensville, MT 59870, telephone: 406-882-4793, email: MissoulaGloryHoleFun@yahoo.com.

19. Defendant Sean D. Fleming ("FLEMING") is an individual whose address is 27120 Barrington Street, Madison Heights, MI 48071, or 32600 Concord Drive, Apartment 205, Madison Heights, MI 48071, telephone: 248-444-4763 or 248-850-7491, email: seandflemingk8khz@gmail.com.

20. Defendant Albert J. Fiorini is an individual whose address is 505 Promontory Drive West, Newport Beach, CA 92660, telephone: 949-698-2704, email: newportbay@aol.com.

21. Defendant Jeff Swiney is an individual whose address is 798 E Lovegrass Drive, San Tan Valley, AZ 85143.

22. Defendant Lisa Jones is an individual whose address is 5121 Pearson Rd, Santa Fe, TX 77517.

23. Defendant Sam Round is an individual whose address is 6733 Highway 155 N, Stockbridge, GA 30281, telephone: 770-507-8978.

24. Defendants Joey Does 1 to 1000 ("JOEY DOES"), are individuals whose names and locations are presently unknown to PLAINTIFF. All of the Defendants may be jointly referred to as "DEFENDANTS" or "JOEYS."

STATEMENT OF FACTS

25. The PLAINTIFF has been producing and directing a documentary film. The PLAINTIFF began his experience in the media as a radio announcer in high school and college. He was in the press corps for the Apollo 11 launch. He was a magazine publisher for much of his career and has long been recognized as a member of the press. The PLAINTIFF publishes an online magazine, and he has produced and hosted online radio and television shows for several years. The PLAINTIFF has recorded thousands of videos, and over 1,200 are currently available on his YouTube Channel.

26. The PLAINTIFF's focus is on exposing dishonesty and corruption. This generates many strong supporters, but virtually every story that he covers generates haters.

27. The PLAINTIFF has become the victim of stalking, harassment, defamation, libel, slander, invasion of privacy, bogus criminal charges against him, and threats (including some death threats). The PLAINTIFF has been followed online and has been contacted online for the purpose of harassing and intimidating him. Stalkers have attempted to terrify, threaten, harass, annoy, and offend the PLAINTIFF with lewd and profane language, claims of lewd and lascivious acts, threats to inflict physical harm, and more.

28. The stalking includes defamation and the making of false accusations and false statements. These include that the PLAINTIFF is a pedophile, a pedophile lover, anti-gay, bigoted, a tax evader, a criminal operating a scam, a terrorist, a sexual deviant, a liar, a con man, and much more. Some people believe this stuff, so this attracts other haters, any one of whom could be the crazy person to injure the PLAINTIFF or his family. These claims are false, and it is defamation.

29. The stalking of the PLAINTIFF includes monitoring, as some have claimed that the PLAINTIFF's Internet activity is being tracked. Some stalkers have participated in the PLAINTIFF's online radio talk shows to monitor and/or to disrupt the calls and the online chat. The monitoring and stalking includes repeated online posts of libelous, defamatory, threatening, harassing statements.

30. The stalking of the PLAINTIFF includes threats, several of which PLAINTIFF considers to be death threats. The PLAINTIFF fears for his safety and the safety of his family.

31. The PLAINTIFF fears identity theft as some have indicated that Stalkers have the PLAINTIFF's social security number. Stalkers have publicized the PLAINTIFF's home address, date of birth, and other personal information. Upon information and belief, some of the PLAINTIFF's confidential information has been provided to others.

32. Any reasonable person in possession of this information would regard it as sufficient to cause another reasonable person distress and fear.

33. The libel and slander is extreme. Stalkers invent one false claim after another. People who the PLAINTIFF doesn't know make statements in writing that have no truth whatsoever and can be easily proven to be false. It's like they feel they can say anything and get away with it.

34. The stalkers, including some or all of the DEFENDANTS, have repeatedly violated the PLAINTIFF's privacy rights and copyright by using photos and videos of him and/or his family that they have no legal right to use. Photographs of the PLAINTIFF have been doctored. Absolutely sickening videos have been produced about the PLAINTIFF. The worst is one that has one scene after another of feces – big piles of sh*t in various settings – and it's all attacking the PLAINTIFF.

35. Internet technology has enabled online groups of anonymous people like this to self-organize to target individuals with online defamation, threats of violence, and technology-based attacks.

36. Stalkers, including some of the DEFENDANTS, have created blogs about the PLAINTIFF containing defamatory content, including some that utilize the PLAINTIFF's name and names associated with the PLAINTIFF. Thus far, the PLAINTIFF has identified over 32 websites set up specifically to defame him and incite people who read the sites, and many other websites operated by DOMBROWSKI and her associates that are used for the same purposes. These sites include the following:

1. <http://i-am-a-pedophile-william-windsor.blogspot.com>
2. <http://william-windsor.blogspot.com/>
3. <http://i-am-a-pedophile-william-windsor.blogspot.com/>

4. <http://tiny-penis-bill-windsor.blogspot.com/>
5. <http://terrorist-billwindsor-lawlessamerica.blogspot.com/>
6. <http://stalker-williamwindsor.blogspot.com/>
7. <http://lawlessamerica-domesticterrorist.blogspot.com/>
8. <http://lawlessamerica-cult.blogspot.com/>
9. <http://i-suck-dick-bill-windsor.blogspot.com/>
10. <http://i-have-no-balls-bill-windsor.blogspot.com/>
11. <http://sexual-pervert-bill-windsor.blogspot.com/>
12. <http://pedophile-bill-windsor.blogspot.com/>
13. <http://bill-windsor.blogspot.com/>
14. <http://bill-windsor.blogspot.com/>
15. <http://bill-windsor-sexual-deviant.blogspot.com/>
16. <http://www.facebook.com/uglyamericanz>
17. <http://www.facebook.com/babs.windsor.35>
18. <http://www.facebook.com/barbara.windsor.134>
19. <http://www.facebook.com/billwindsor.files>
20. <http://www.facebook.com/billwindsore>
21. <http://www.facebook.com/bill.windsor.33>
22. <http://www.facebook.com/ceaseanddesistbillwindsor>
23. <http://www.facebook.com/pages.exposing-bill-windsor>
24. <http://www.facebook.com/pages/lawless-america-is-a-fraud>
25. <http://www.facebook.com/pages-lawless-america-the-movie-scam>
26. <http://www.facebook.com/lawlessisascam>
27. <http://williamwindsor-sexualpredator.blogspot.com/>
28. <http://www.facebook.com/lawlessnomore>
29. <http://www.facebook.com/mary.windsor.102>
30. <http://www.facebook.com/walter.windsor.96>
31. <http://www.facebook.com/billwindsorisafraudandliesouttheass>
32. <http://amothersintelligencesecretservice.blogspot.com/2013/06/my-name-is-bill-windsor-i-am-sexual.html>
33. <http://thetruthaboutthefamilycourt.blogspot.com/2013/06/my-name-is-bill-windsor-i-am-sexual.html>
34. <http://abuserrightsfatherrights.blogspot.com>
35. <http://amothersintelligencesecretservice.blogspot.com/>
36. <http://www.kscourtwhores.blogspot.com/>
37. <http://thetruthaboutthefamilycourt.blogspot.com>
38. <http://claudinedombrowski.blogspot.com>
39. <http://glennscult.blogspot.com>
40. <http://bx.businessweek.com/open-government/janice-levinson-using-the-blood-of-battered-mothers-and-children-for-her-personal-gain/7420065467279087640-54223d6685f4e599a8d5d17d4bb694b9/>
41. <http://amothersintelligencesecretservice.blogspot.com/2013/06/my-name-is-bill-windsor-i-am-sexual.html>
42. <http://www.kscourtwhores.blogspot.com/2013/06/bill-windsor-sexual-deviant-homeland.html>
43. <http://joeyisalittlekid.blogspot.com/2013/05/sexual-deviant-bill-windsor.html>

44. <http://www.kscourtwhores.blogspot.com/2013/07/announcement-for-all-protective-mothers.html>
45. <http://bx.businessweek.com/profile/claudine-dombrowski/cdombrowski891/>
46. [Bill Windsor – Sexual Deviant, Homeland Terrorist and His Cult Group](#)
47. [Janice Levinson: Using the Blood of Battered Mothers and Children for](#)
48. [Kansas Secretary of State Is not happy with Lawless America](#)
49. [Janice Levinson: When You Play With Wolves](#)
50. [Bill Windsor – Endangering Domestic Violence Victims and Survivors](#)
51. [William M Windsor: An American Terrorist](#)
52. [Bill Windsor – Endangering Domestic Violence Victims and Survivors](#)
53. <http://bx.businessweek.com/open-government/view?url=http%3A%2F%2Fjoeyisalittlekid.blogspot.com%2F2013%2F05%2Fsexual-deviant-bill-windsor.html>
54. <http://bx.businessweek.com/open-government/bill-windsor—sexual-deviant-homeland-terrorist-and-his-cult-group-lawless-america/9132679831200724084-9af7df0d7aabf80a43169c3e40317490/>
55. [Unforgiven Little Bill Death Scene —](#)
<https://www.facebook.com/lorraine.tipton.14>
56. http://batteredmotherscustody.blogspot.com/2013_03_01_archive.html

37. On May 3, 2012, BOUSHIE first threatened and intimidated the PLAINTIFF. He said he was going to come after the PLAINTIFF. “I had enough crap from all the wackjobs associated with this lying POS. You can tell her I’m coming for her and I’m going to make sure she is locked away forever. Want to screw with me and the same goes for you!!” When BOUSHIE began posting on THE PLAINTIFF’s Facebook pages — www.facebook.com/billwindsor1 and www.facebook.com/lawlessamerica, a Glock gun was the gravatar/photo that he used. He subsequently used a large knife and then a photo of Charles Manson.

38. On September 13, 2012, BOUSHIE falsely posted online that the PLAINTIFF is a liar, an ahole, and a POS. On September 14, 2012, BOUSHIE continued to cyberstalk the PLAINTIFF – calling him a liar and psycho in online posts. This is false and defamatory.

39. In November 2012, JOEYISALITTLEKID.Blogspot.com published articles that defame and demean the PLAINTIFF in a variety of ways. The PLAINTIFF was called a

huckster. This is false. One article said the PLAINTIFF created his movie as part of a con game. This accuses the PLAINTIFF of criminal activity. This is false.

40. In December 2012, JOEYISALITTLEKID.Blogspot.com published approximately 6 articles that defame and demean the PLAINTIFF in a variety of ways.

41. On or about December 31, 2012, Loryn Ryder published that the Plaintiff is a fraud. This is false. It is defamatory, and it places the Plaintiff in a false light.

42. In January 2013, JOEYISALITTLEKID.Blogspot.com published approximately 41 articles that defame and demean the PLAINTIFF in a variety of ways. One article refers to the PLAINTIFF as Hitler. This is false. One article says the PLAINTIFF'S movie is a fake. This is false.

43. On January 5, 2013, BOUSHIE (using his alias John Smith) published that the PLAINTIFF had a psychotic break and threatened the PLAINTIFF.

44. On January 6, 2013, BOUSHIE (using his John Smith alias on Joeyisalittlekid.blogspot.com) published a statement that implies that he will shoot the PLAINTIFF if he comes to Montana.

45. On January 19, 2013, BOUSHIE slandered the PLAINTIFF with an online post that says the PLAINTIFF is a dickless koward, mentally ill, and a pedophile. Oh, and he also says "bite me, asshole," and the email address used is gofuckyourself@yahoo.com. These claims are false.

46. In February 2013, JOEYISALITTLEKID.Blogspot.com published approximately 31 articles that defame and demean the PLAINTIFF in a variety of ways. One article claims the PLAINTIFF'S Washington DC event was a disaster. This is false. Several articles say the

PLAINTIFF is Hitler. This is false. One article says the PLAINTIFF is a terrorist. This is false. One article says the PLAINTIFF has lost his mind. This is false.

47. On or about February 12, 2013, Lorraine Tipton published on the Plaintiff's Facebook page that the Plaintiff is a con man from way back and a liar. These statements are false, and this is defamation and places the Plaintiff in a false light.

48. On February 14, 2013, BOUSHIE published online a host of obscenities and threats against the PLAINTIFF'S wife (now ex-wife) and the PLAINTIFF.

49. On or about February 24, 2013, Lorraine Tipton published that the Plaintiff has no significant intellectual skills whatsoever and lies brazenly. These statements are false, and this is defamation and places the Plaintiff in a false light.

50. On February 27, 2013, BOUSHIE published that the PLAINTIFF is a sociopath and a liar, neither of which is true.

51. In March 2013, JOEYISALITTLEKID.Blogspot.com published approximately 23 articles that defame and demean the PLAINTIFF in a variety of ways. One article claims the PLAINTIFF had a woman sitting on his lap during filming in Michigan and was grabbing her on the ass. This is false.

52. On March 6, 2013 the PLAINTIFF published a request for corrections and retractions to defamation, libel, and slander from the DEFENDANTS and others. It was ignored. There have not been any corrections or retractions.

53. On or about March 9, 2013, someone stole the PLAINTIFF's intellectual property and published a photo of the PLAINTIFF with the words "Con Man" added to the cap he is wearing. This is false, defamation, and it puts the PLAINTIFF in a false light.

54. On or about March 9, 2013, Kimberly Wigglesworth published on the Washington Times newspaper website that the PLAINTIFF is conning people. This is false, defamation, and it puts the PLAINTIFF in a false light.

55. On or about midnight on March 11, 2013, the PLAINTIFF's deceased father's identity was stolen, and a Facebook page was set up pretending to be the PLAINTIFF's father. The page had photos of the PLAINTIFF's father on his death bed as well as a photo of his coffin at the funeral home. The person or persons pretending to be Walter Windsor posted all types of horrible stuff, including the threat that he, she, or it will post photos of the PLAINTIFF's mother (who died of breast cancer 35 years ago) having sex with his deceased father. The person or persons pretending to be Walter Windsor posted various messages on the PLAINTIFF's Facebook page.

56. On March 12, 2013, BOUSHIE published false claim that the PLAINTIFF created a Facebook page for his deceased father.

57. On March 18, 2013, BOUSHIE published that the PLAINTIFF should suck his balls. This is demeaning and puts the PLAINTIFF in a false light.

58. On March 13, 2013, BUTLER published on Blogspot.com that the PLAINTIFF is a fraud and a liar. This is false.

59. On or about March 19, 2013, Claudine Dombrowski published that the PLAINTIFF is a con man. This is a criminal charge, and it is false. Claudine Dombrowski has published that the film the PLAINTIFF is producing is a "fake movie." This is false, and it is defamation. This puts the PLAINTIFF in false light. The American Mothers Political Party ("AMPP") and Claudine Dombrowski published that the PLAINTIFF "has hurt so many through black mail, coercion and has threatened the safety of so many mothers and their children by

sharing their intimate and confidential information.” This is false, and it is defamation. This puts the PLAINTIFF in false light.

60. On March 21, 2013, BOUSHIE published that the PLAINTIFF is a fraud, a con artist, and a liar — all false. BOUSHIE also published that the PLAINTIFF and his wife (now ex-wife) are going to jail. This is false. BOUSHIE also published that the PLAINTIFF is a psychotic. This is false.

61. On March 28, 2013, BOUSHIE posted that the PLAINTIFF needs to go fuck himself. This is demeaning and puts the PLAINTIFF in a false light.

62. Joeyisalittlekid.blogspot.com has published that the PLAINTIFF is a con man. This is a criminal charge, and it is false.

63. Joeyisalittlekid.blogspot.com has published that the film the PLAINTIFF is producing is a “fake movie.” This is false, and it is defamation. This puts the PLAINTIFF in false light and damages his reputation in his profession.

64. Upon information and belief, a Defendant published that the PLAINTIFF “gets convicted sex offenders to do his filming.” This is false, and it is defamation. This puts the PLAINTIFF in false light.

65. On March 29, 2013, JOEYISALITTLEKID published a wanted poster on Blogspot.com for the PLAINTIFF “dead or alive.” The article called the PLAINTIFF a maniacal monster, among other things. This is false. The wanted poster was an implied death threat.

66. On April 1, 2013, BOUSHIE published an obscene message using a fake identity – Billyisanasshole. This was demeaning and put the PLAINTIFF in a false light.

67. On April 7, 2013, Facebook posts appeared in the name of BOUSHIE to libel the PLAINTIFF and threaten him with murder.

68. On or about April 9, 2013, the PLAINTIFF's deceased mother's identity was stolen, and a Facebook page pretending to be PLAINTIFF's mother. The page had a photo that was presented as if it was PLAINTIFF's mother's skeleton. The person or persons pretending to be Mary Windsor posted various messages on the PLAINTIFF's Facebook page.

69. On or about April 9, 2013, Claudine Dombrowski stole the PLAINTIFF's intellectual property and published it on her YouTube site. The PLAINTIFF is aware of at least 50 videos that have been created by DEFENDANTS and others to defame the PLAINTIFF, and many of these use the PLAINTIFF'S stolen intellectual property, photographs, and videos. When AMPP and Claudine Dombrowski were asked to remove them for violating copyright, they wrote to the PLAINTIFF and said: "BACK THE FUCK OFF." Upon information and belief, AMPP has encouraged its members to watch the movie "Kill Bill." The PLAINTIFF considers this a veiled death threat to him. AMPP works in a partnership-like arrangement with JOEYISALITTLEKID.

70. On April 10, 2013, BOUSHIE falsely published that the PLAINTIFF had herpes and was cheating on his wife. This was false.

71. On or about April 18, 2013, the PLAINTIFF's identity was stolen, and a Facebook page was set up pretending to be the PLAINTIFF – Bill Windsor. The page had a photo of the PLAINTIFF's face on someone else's fat body. The person or persons pretending to be Bill Windsor posted various messages on the PLAINTIFF's Facebook page as if they were from the PLAINTIFF.

72. On April 18, 2013, a photo of the PLAINTIFF'S father from his death bed is published claiming he is having phone sex with his deceased wife. This is a gross invasion of privacy and extremely demeaning to the PLAINTIFF.

73. In April 2013, JOEYISALITTLEKID.Blogspot.com published approximately 20 articles that defame and demean the PLAINTIFF in a variety of ways. One article says the PLAINTIFF is a terrorist. This is false.

74. On April 28, 2013, the PLAINTIFF published an article titled "The High Cost of Fighting Injustice and trying to help Save America: Bill Windsor has lost almost everything." The article disclosed that the PLAINTIFF and his wife had been together for 44 years, never had a serious problem in their marriage, but she filed for divorce because she is so totally afraid of people like the DEFENDANTS and people who have threatened the PLAINTIFF and her.

75. In May 2013, JOEYISALITTLEKID.Blogspot.com published approximately 17 articles that defame and demean the PLAINTIFF in a variety of ways. One article says the PLAINTIFF is a sexual deviant. This is false. Another article says the PLAINTIFF is a liar. This is false. Another article says the PLAINTIFF supports cold-blooded killers. This is false.

76. In May 2013, BUTLER published on Facebook that the PLAINTIFF is a liar. This is false.

77. In May 2013, a DEFENDANT believed to be BUTLER or FLEMING, using the alias HamRadioJunkie, published on YouTube that the PLAINTIFF'S movie does not and will not exist and that anyone who works with the PLAINTIFF will have their case destroyed at Joeyisalittlekid.blogspot.com. This is false and damaging to the PLAINTIFF.

78. In May 2013, BOUSHIE published the offer of a reward for the PLAINTIFF's murder. BOUSHIE also published that the PLAINTIFF had been making up information about him for years. This is false.

79. On May 12, 2013, BOUSHIE published on Facebook page that he predicts it is just a matter of time before the PLAINTIFF is murdered. On May 12, 2013, BOUSHIE offered a

reward for the PLAINTIFF'S murder. This is demeaning and puts the PLAINTIFF in a false light.

80. On May 13, 2013, BOUSHIE published that the PLAINTIFF would not survive his current movie filming trip.

81. On May 25, 2013, Joeyisalittlekid.blogspot.com published that the PLAINTIFF'S movie is a fake and that the itinerary with the movie was filled with pedophiles. These statements are false.

82. On or about May 28, 2013, Joeyisalittlekid.blogspot.com published that the PLAINTIFF is a sexual deviant. These statements are false, and this is defamation.

83. On or about May 28, 2013, Claudine Dombrowski published on the PLAINTIFF's Facebook page that the PLAINTIFF is a sexual deviant. These statements are false, and this is defamation. When conducting a Google search for the words "Bill Windsor sexual deviant," 32 million web pages were returned. A Google search for "Bill Windsor terrorist" returned 1,600,000 web pages.

84. On or about May 30, 2013, Claudine Dombrowski published on the PLAINTIFF's YouTube page that the PLAINTIFF is a sexual deviant, a sick animal, moral-less, unethical, and a freck. These statements are false, and this is defamation.

85. On June 1, 2013, BOUSHIE libeled the PLAINTIFF by posting online that the PLAINTIFF is a pedophile. This is false. He also published that the PLAINTIFF is a psychopath. This is false.

86. On or about June 1, 2013, Kimberly Wigglesworth published on YouTube that the PLAINTIFF was fired for being a crook, is operating a scam, and lies about anything and

everything. Kimberly Wigglesworth also published that there is no movie and that the PLAINTIFF is a monster. This is false, defamation, and it puts the PLAINTIFF in a false light.

87. On June 4, 2013, Claudine Dombrowski published on Business Week's website that the PLAINTIFF is a sexual deviant and a terrorist. These statements are false; this is defamation; and this puts the PLAINTIFF in a false light.

88. In June 2013, BUTLER threatened to assault or kill the PLAINTIFF in a video that he recorded and published on YouTube. The video may be seen at: <http://youtu.be/6eHFI2jp1KU>. This video includes defamation, is demeaning, and puts the PLAINTIFF in a false light.

89. In June 2013, JOEYISALITTLEKID.Blogspot.com published approximately 14 articles that defame and demean the PLAINTIFF in a variety of ways.

90. On June 4, 2013, an article that is believed to have originated with Joeyisalittlekid.blogspot.com published on Business Week's website that the PLAINTIFF is a sexual deviant and a terrorist. These statements are false; this is defamation; and this puts the PLAINTIFF in a false light.

91. On June 14, 2013, BOUSHIE offered a reward if the PLAINTIFF was sent to the morgue in Arizona. BOUSHIE also libeled the PLAINTIFF by publishing that he is a liar and falsifies information. This is false, and this puts the PLAINTIFF in a false light.

92. On June 19, 2013, BOUSHIE published criminal defamation of the PLAINTIFF on Craigslist.

93. On June 21, 2013, BOUSHIE posted a Scam Alert on Craigslist in which he libels, defames, slanders, harasses, and stalks the PLAINTIFF.

94. On June 22, 2013, the PLAINTIFF'S Lawless America Facebook Page was removed by Facebook claiming it included nudity, pornography, and the solicitation of sex. This was absolutely false. The loss of this page has been extremely damaging to the PLAINTIFF.

95. On June 25, 2013, a fake Facebook page was set up in the name of Bill Windsor + e. This fake page was used to defame the PLAINTIFF using what appeared to be his own name.

96. In July 2013, JOEYISALITTLEKID.Blogspot.com published approximately 17 articles that defame and demean the PLAINTIFF in a variety of ways.

97. In August 2013, JOEYISALITTLEKID.Blogspot.com published approximately 16 articles that defame and demean the PLAINTIFF in a variety of ways. The PLAINTIFF is called a pervert and a narcissist. This is false.

98. On August 4, 2013, a car burst into flame and heavy smoke next to the Plaintiff as he was driving in Montana. BOUSHIE claims he fired the shot to cause this and missed the PLAINTIFF.

99. BOUSHIE is a serial cyber-stalker who has terrorized the PLAINTIFF and his family. BOUSHIE has threatened to hurt or kill the PLAINTIFF approximately 16 times. BOUSHIE has sent approximately 100 stalking emails to the PLAINTIFF, filled with obscenities, threats, intimidation, and more.

100. Since May 2012, BOUSHIE has emailed the PLAINTIFF under various names and email addresses as well as posted online using various names and aliases. He has posted harassing messages, threats, and defamation on the PLAINTIFF'S website, on his Facebook page, on his YouTube page, and on the sites and pages of others.

101. The PLAINTIFF sent several cease and desist emails to him as well as complaints to abuse@yahoo.com and abuse@gmail.com.

102. Here's one of the BOUSHIE'S YouTube posts: "Anything Wiliam Windsor is involved with is bound to be a complete lie and a distorton of any reality. He is only showing his mentally disturbed and distorted one sided view of every story, most of it lies and less than half truth. Anyone stupid enough to support a extortionist, scam artist, eldery abusing scum like Crystal Cox is obviously not very intellegent and ov dubious morals character. My bet is he wants payoffs from people to not extort them on you tube a trick learned from crystal Cox." This is false, defamatory, and it puts the PLAINTIFF in a false light.

103. BOUSHIE has taken credit for filing bogus copyright/trademark violation reports with YouTube that caused two videos to be removed and a strike issued against the PLAINTIFF'S YouTube Channel.

104. BOUSHIE knows that the PLAINTIFF has business relationships and contracts with many people. He interfered with those contracts by giving false, defamatory information to these people and advising them to cease doing business with the PLAINTIFF.

105. In September 2013, JOEYISALITTLEKID.Blogspot.com published approximately 12 articles that defame and demean the PLAINTIFF in a variety of ways. One article states that the PLAINTIFF'S business has died. This is false. Another article says the PLAINTIFF is a terrorist. This is false.

106. On September 8, 2013, JOEYISALITTLEKID.Blogspot.com published that the PLAINTIFF "has scammed people all his life." This is false.

107. In October 2013, at least four of the PLAINTIFF'S copyrighted photos are used on JOEYISALITTLEKID.Blogspot.com. The published information accompanying these photos defames and demeans the PLAINTIFF in a variety of ways.

108. On November 19, 2013, JOEYISALITTLEKID published that the PLAINTIFF is a terrorist on Blogspot.com. This is false.

109. In November 2013, at least five of the PLAINTIFF'S copyrighted photos are used on JOEYISALITTLEKID.Blogspot.com in various humiliating poses as a gnome, a fat man wearing a leotard, and in a kangaroo pouch. The published information accompanying these photos defames and demeans the PLAINTIFF in a variety of ways.

110. In addition to the articles published on Joeyisalittlekid.blogspot.com, there are thousands of comments posted by JOEYS. Many published comments are defamatory, criminal accusations, demeaning, and more.

111. Upon information and belief, one or more of the DEFENDANTS published a false report about the PLAINTIFF on Rip-Off Report. These statements are false, and this is defamation.

112. DEFENDANTS published the PLAINTIFF's copyrighted material in videos on their web pages without permission and maintained the use of this material despite cease and desist notices.

113. Upon information and belief, some of the DEFENDANTS have published a series of videos that defame the PLAINTIFF, call him a Hitler, and much more. These videos are false, and this is defamation.

114. DEFENDANTS know that the PLAINTIFF has business relationships and contracts with many people. They interfered with those contracts by giving false, defamatory information to these people and advising them to cease doing business with the PLAINTIFF.

115. DEFENDANTS have conspired to libel, slander, and defame the PLAINTIFF to put him in a false light and cause him emotional distress.

116. DEFENDANTS have been served with numerous cease and desist notices about their cyberstalking and harassment, but they ignore them.

117. There are many hundreds of lies, libelous, slanderous, defamatory statements published online about the PLAINTIFF by a host of people, many of who use fake names. The discovery process in this case will need to identify who these people are. Upon information and belief, various DEFENDANTS use a variety of fake names online. The PLAINTIFF has over 15 gigabytes of information that includes a perhaps unprecedented case of defamation and conspiracy.

118. The PLAINTIFF'S life has been threatened many times in 2012 and 2013. The PLAINTIFF believes many of these threats were spawned as the result of the many wrongful acts of the DEFENDANTS.

119. The PLAINTIFF is the victim of severe emotional distress. As a result of all of this, the PLAINTIFF's wife of 42 years has divorced him. His children no longer have anything to do with him. He is not allowed to have any communication with his granddaughters. He is homeless. He does not have a paying job.

COUNT I – DEFAMATION

120. The facts in paragraphs 1-119 are incorporated herein.

121. A libel is a defamation expressed in written or other graphic form that tends to blacken the memory of the dead or that tends to injure a living person's reputation and thereby expose the person to public hatred, contempt or ridicule, or financial injury or to impeach any person's honesty, integrity, virtue, or reputation or to publish the natural defects of anyone and thereby expose the person to public hatred, ridicule, or financial injury.

122. In Texas, the elements of libel as defamation are: (1) false and defamatory words (2) published to a third person (3) that defamed the plaintiff (4) while either acting with actual malice or negligence regarding the truth of the statement. An organization may be liable for the defamatory utterances of its agent that are made while acting within the scope of the agent's authority. A statement is defamatory if it tends to injure a living person's reputation and thereby expose the person to public hatred, contempt or ridicule, or financial injury or to impeach any person's honesty, integrity, virtue, or reputation.

123. DEFENDANTS have published false and defamatory words about the PLAINTIFF. Published statements were false. Many statements are mentioned above, and a massive amount of additional published statements will be put into the record. The PLAINTIFF believes much more will surface in discovery.

124. Statements that DEFENDANTS have published were communicated to third persons. Many statements have been published online for the world to see.

125. Statements made by DEFENDANTS have harmed the reputation of PLAINTIFF and have lowered him in the estimation of the community and have deterred third persons from associating or dealing with him. Many people have ceased dealing with the PLAINTIFF because of the statements.

126. DEFENDANTS know the difference between what's true and what's a lie. They know about laws to protect people from libel, slander, defamation, harassment, and stalking, but they acted anyway. They had a duty to abide by the law, and they didn't ignore it once; the laws were ignored again and again and again. The defamatory statements were made while either acting with actual malice or negligence regarding the truth of the statement.

127. Statements published by DEFENDANTS were not opinions and are not protected by freedom of speech.

128. The PLAINTIFF suffered damage as a result of statements by DEFENDANTS. The PLAINTIFF has lost his wife, his relationship with his children, and any contact whatsoever with his grandchildren. He has lost his home. His movie project has been severely hurt by what the DEFENDANTS have done. His reputation has been tarnished almost beyond belief. The PLAINTIFF has incurred costs and lost money as a result of the actions of the DEFENDANTS.

COUNT II -- DEFAMATION PER SE

129. The facts in paragraphs 1-128 are incorporated herein.

130. Statements made by DEFENDANTS impute the commission of crimes or acts that constitute an indictable offense. Many statements made have accused the PLAINTIFF of criminal acts.

131. Many statements made by DEFENDANTS impute fraud, misconduct, or incompetence in the PLAINTIFF's business or occupation.

132. Statements made by DEFENDANTS tend to harm the reputation of PLAINTIFF and to lower him in the estimation of the community or to defer third persons from associating or dealing with him. Many people have ceased dealing with the PLAINTIFF because of the statements.

133. Statements alleging misconduct in the course of performing one's professional duties constitute defamation per se. Statements made by the DEFENDANTS were defamatory as a matter of law.

134. Accusing someone of committing a crime constitutes defamation per se.

COUNT III – SLANDER

135. The facts in paragraphs 1-134 are incorporated herein.

136. Slander is defined as a defamatory statement orally communicated or published to a third party without explanation or excuse that is either defamatory in itself or defamatory because it results in actual damages. In Texas, the elements of slander are: (1) a defamatory statement (2) orally communicated or published (3) to a third person (4) without legal excuse.

137. DEFENDANTS have orally communicated and published false and defamatory words about the PLAINTIFF. These words were false. Audio recordings from the Joeyisalittlekid radio program will be put into the record as evidence of the slander.

138. Statements that DEFENDANTS have published were communicated to third persons. Many oral statements have been published online for the world to hear.

139. Statements made by DEFENDANTS have harmed the reputation of PLAINTIFF and have lowered him in the estimation of the community or to defer third persons from associating or dealing with him. Many people have ceased dealing with the PLAINTIFF because of the statements.

140. DEFENDANTS know the difference between what's true and what's a lie. They know about laws to protect people from libel, slander, defamation, harassment, and stalking, but they acted anyway. They had a duty to abide by the law, and they didn't ignore it once; the laws were ignored again and again and again. The defamatory statements were made while either acting with actual malice or negligence regarding the truth of the statement.

141. Statements published and orally communicated by DEFENDANTS were not opinions and are not protected by freedom of speech. The statements were made without legal excuse.

142. The PLAINTIFF suffered damage as a result of statements by DEFENDANTS. The PLAINTIFF has lost his wife, his relationship with his children, and any contact whatsoever with his grandchildren. He has lost his home. His movie project has been severely hurt by what the DEFENDANTS have done. His reputation has been tarnished almost beyond belief. The PLAINTIFF has incurred costs and lost money as a result of the actions of the DEFENDANTS.

COUNT IV – DEFAMATION PER SE

143. The facts in paragraphs 1-142 are incorporated herein.

144. Statements made by DEFENDANTS impute the commission of crimes or acts that constitute an indictable offense. Many statements made have accused the PLAINTIFF of criminal acts. DEFENDANTS have accused the PLAINTIFF of being a pedophile, a con man, a scam artist, a thief, and of committing fraud, and more. A number of examples are provided above, but there are far more. The PLAINTIFF hasn't had time to read all of the websites that have been set up and all the articles that have been posted, but it is possible that there are many thousands of acts of defamation. With the many websites on which the defamation has been placed, there could be as many as 100,000 instances of defamation.

145. Accusing the PLAINTIFF of committing a crime constitutes slander per se.

146. Many statements made by DEFENDANTS impute fraud, misconduct, or incompetence in the PLAINTIFF's business or occupation. Statements made by DEFENDANTS tend to harm the reputation of PLAINTIFF and to lower him in the estimation of the community or to defer third persons from associating or dealing with him. Many people have ceased dealing with the PLAINTIFF because of the statements.

147. Statements alleging misconduct in the course of performing one's professional duties constitute defamation per se. Statements made by the DEFENDANTS were defamatory as a matter of law.

COUNT V – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

148. The facts in paragraphs 1-147 are incorporated herein.

149. In Texas, the elements of intentional infliction of emotional distress are (1) a defendant acted intentionally or recklessly; (2) the conduct was extreme and outrageous; (3) the conduct caused the plaintiff emotional distress; and (4) the resulting emotional distress was severe.

150. DEFENDANTS intentionally or negligently inflicted emotional distress on the PLAINTIFF. DEFENDANTS acted intentionally or recklessly. DEFENDANTS know the difference between what's true and what's a lie. They know about laws to protect people from libel, slander, defamation, harassment, and stalking, but they acted anyway. They had a duty to abide by the law, but they didn't ignore it once; the laws were ignored again and again and again.

151. Conduct of DEFENDANTS was extreme and outrageous. These outrageously false, criminal claims would prompt an average member of the community to exclaim "outrageous!"

152. The conduct of DEFENDANTS caused the distress.

153. The distress caused was severe emotional distress to the PLAINTIFF. The outrageous lies, libel, slander, and defamation are bad alone, but the effect on the PLAINTIFF's life with the loss of his wife, his family, his home, and life as he knew it has caused severe emotional distress.

COUNT VI – NEGLIGENCE

154. The facts in paragraphs 1-153 are incorporated herein.

155. DEFENDANTS were negligent. Negligence is the failure to exercise the degree of care which a reasonably prudent and careful person would use under the same or similar circumstances.

156. The elements of a negligence claim are (1) The existence of a duty on the part of the DEFENDANTS to protect the PLAINTIFF from the injury of which he complains; (2) an act or omission in breach of that duty, (3) damages proximately caused by the breach. Proximate cause has two components: (1) foreseeability and (2) cause-in-fact. For a negligent act or omission to have been a cause-in-fact of the harm, the act or omission must have been a substantial factor in bringing about the harm, and absent the act or omission—*i.e.*, but for the act or omission—the harm would not have occurred.

157. Viewed objectively from the DEFENDANTS' standpoint, the acts complained of involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others.

158. The DEFENDANTS had actual, subjective awareness of the risk involved, but nevertheless proceed in conscious indifference to the rights, safety, or welfare of the PLAINTIFF.

159. The DEFENDANTS had a duty to abide by the laws regarding defamation, cyberstalking, harassment, libel, slander, and they ignored that duty. Harm was clearly foreseeable. Duty, the obligation of one person to another, flows from millennia of social customs, philosophy, and religion. Serving as the glue of society, duty is the thread that binds

humans to one another in community. Duty constrains and channels behavior in a socially responsible way. The DEFENDANTS did not behave in a socially responsible way. Their actions were totally irresponsible.

160. There is a standard of proper behavior necessary to avoid imposing undue risks of harm to other persons and their property, and the DEFENDANTS breached their duty. They ignored the behavior necessary to avoid harming the PLAINTIFF. They thumbed their noses at the law and the PLAINTIFF with one blatant defamatory statement after another. The DEFENDANTS had a duty to act with reasonable care for the safety the PLAINTIFF. The DEFENDANTS acted carelessly, unreasonably, without due care. The DEFENDANTS breached the duty of care, and their conduct was negligent.

161. The damages the PLAINTIFF suffers are a proximate result of the Defendants' breach of duty. The DEFENDANTS must be required to compensate the PLAINTIFF for harm improperly inflicted. How do you compensate the PLAINTIFF for the loss of his wife, his children, and his grandchildren? As much as money damages can do so, the law requires the DEFENDANTS to restore what the PLAINTIFF lost as a proximate result of the DEFENDANTS' wrongs.

162. The PLAINTIFF has been caused pain and suffering, emotional distress, lost enjoyment of life, loss of his marriage, loss of his relationship with his family, loss of his home, severe damage to his reputation, damage to his career, and more.

COUNT VII – TORTIOUS INTERFERENCE WITH CONTRACT
OR BUSINESS EXPECTANCY

163. The facts in paragraphs 1-162 are incorporated herein.

164. In Texas, the elements of tortious interference with a contract are: (1) the existence of a contract subject to interference; (2) the occurrence of an act of interference that was willful and intentional; (3) the act was a proximate cause of the claimant's damage; and (4) actual damage or loss occurred.

165. The PLAINTIFF was involved in a valid business relationship. The DEFENDANTS knew that the PLAINTIFF had a valid business relationship with people all over America in filming videos, conducting interviews, and producing a movie. Several of the DEFENDANTS signed a contract with the PLAINTIFF, and they were aware that everyone filmed by the PLAINTIFF signed the same contract.

166. DEFENDANTS were aware of the relationship. The DEFENDANTS were totally aware of the business relationship that the PLAINTIFF has had with thousands of people.

167. DEFENDANTS intentionally interfered with the relationship. DEFENDANTS know the difference between what's true and what's a lie. They know about laws to protect people from libel, slander, defamation, harassment, and stalking, but they acted anyway. They had a duty to abide by the law, and they didn't ignore it once; the laws were ignored again and again and again. They took actions to damage the PLAINTIFF's business relationships.

168. DEFENDANTS acted without justification. There can never be a justification for lies, libel, slander, harassment, defamation, and false criminal charges.

169. The PLAINTIFF suffered damages as a direct result of conduct of DEFENDANTS. Many people have dropped out of the PLAINTIFF's projects. Very few people contact the PLAINTIFF now while many thousands did before this. The PLAINTIFF had over 50,000 followers on Facebook before this, and now he has less than 100. The DEFENDANTS caused this.

**COUNT VIII – TORTIOUS INTERFERENCE WITH A PROSPECTIVE BUSINESS
RELATIONSHIP**

170. The facts in paragraphs 1-169 are incorporated herein.

171. In Texas, the elements of tortious interference with a prospective business relationship are (1) a reasonable probability of entering into a business relationship, (2) an independently tortious or unlawful act that prevented the relationship from occurring, (3) the defendant acted with a conscious desire to prevent the relationship from occurring, or the defendant knew the interference was certain or substantially certain to occur, and (4) actual harm or damages.

172. The PLAINTIFF was involved in valid prospective business relationships. The DEFENDANTS knew that the PLAINTIFF had a valid business relationship with people all over America in filming videos, conducting interviews, and producing a movie. The DEFENDANTS knew that the PLAINTIFF had a reasonable probability of entering into a business relationship with people and companies in the motion picture and television industry as well as with people to be filmed.

173. DEFENDANTS were aware of the relationship by reading about it on the PLAINTIFF'S websites. The DEFENDANTS were aware of the business relationship that the PLAINTIFF has had with thousands of people.

174. DEFENDANTS intentionally interfered with the relationships. DEFENDANTS know the difference between what's true and what's a lie. They know about laws to protect people from libel, slander, defamation, harassment, and stalking, but they acted anyway. They had a duty to abide by the law, and they didn't ignore it once; the laws were ignored again and again and again. They took actions to damage the PLAINTIFF's business relationships.

175. DEFENDANTS acted without justification. There can never be a justification for lies, libel, slander, harassment, defamation, and false criminal charges.

176. The PLAINTIFF suffered damages as a direct result of conduct of DEFENDANTS. Many people have dropped out of the PLAINTIFF's projects. Agents and companies have not responded to the PLAINTIFF. Very few people contact the PLAINTIFF now while many thousands did before this. The PLAINTIFF had over 50,000 followers on Facebook before this, and now he has just a few. The DEFENDANTS caused this.

COUNT IX – INVASION OF PRIVACY BY MISAPPROPRIATION

177. The facts in paragraphs 1-176 are incorporated herein.

178. In Texas, the elements of invasion of privacy by misappropriation are: (1) the defendant appropriated the plaintiff's name or likeness; (2) the plaintiff can be identified from the publication; and (3) there was some advantage or benefit to the defendant.

179. DEFENDANTS have invaded the PLAINTIFF's privacy. The PLAINTIFF's name has been misappropriated as has the name of his deceased parents. The PLAINTIFF's photos and intellectual property have been misappropriated many times.

180. The PLAINTIFF's personal photos, photos of family members, as well as photos and alleged photos of his family have been published to damage the PLAINTIFF and in violation of his privacy and intellectual property rights. The matters publicized would be offensive to a reasonable person. The disclosures have humiliated the PLAINTIFF.

181. The PLAINTIFF and his parents are identifiable by their names and/or likenesses.

182. The DEFENDANTS benefited from the use of the names and likenesses to promote their own websites and their own agendas. The DEFENDANTS benefited from the use

of the names and likenesses to deceive others into thinking online published statements and information came from the PLAINTIFF or his parents. The DEFENDANTS benefited from the use of the names and likenesses to defame, embarrass, humiliate, and belittle the PLAINTIFF. The DEFENDANTS benefited from the use of the names and likenesses to damage the PLAINTIFF'S relationship with members of his family.

COUNT X – INVASION OF PRIVACY

183. The facts in paragraphs 1-182 are incorporated herein.

184. The elements of a claim for invasion of privacy are (1) the defendant intentionally intruded on the plaintiff's solitude, seclusion, or private affairs; and (2) the intrusion would be highly offensive to a reasonable person.

185. Defendants have given publicity to private, personal matters concerning the PLAINTIFF.

186. Defendants have invaded the PLAINTIFF's privacy. The PLAINTIFF's name has been misappropriated as has the name of his deceased parents. The PLAINTIFF's photos and intellectual property have been misappropriated many times.

187. Private facts about the PLAINTIFF have been publicly disclosed, and totally false personal information has been publicly disclosed. Facts disclosed include alleged sex life, alleged criminal activity, alleged failure to pay taxes, alleged pedophilia, and much more. There is an absolutely false article on Business Week's website created by DEFENDANTS that claims the PLAINTIFF is a sexual deviant. The PLAINTIFF's personal photos, photos of family members, as well as photos and alleged photos of his family have been published to damage the PLAINTIFF and in violation of his privacy and intellectual property rights. The matters

publicized would be offensive to a reasonable person. The disclosures have humiliated the PLAINTIFF. The PLAINTIFF has been portrayed in an absolutely false light to the public.

COUNT XI – CONSPIRACY TO COMMIT DEFAMATION

188. The facts in paragraphs 1-187 are incorporated herein.

189. The elements for civil conspiracy under Texas law are: (1) two or more persons, (2) an object to be accomplished, (3) a meeting of the minds on the object or course of action, (4) one or more unlawful, overt acts, and (5) damages as the proximate result.

190. DEFENDANTS conspired to defame the PLAINTIFF.

191. DEFENDANTS formed and operated the conspiracy. The object to be accomplished was to defame, libel, slander, harass, cyberstalk, falsely charge the PLAINTIFF with felonies, cause emotional distress, and damage the PLAINTIFF. Evidence shows that DEFENDANTS had a meeting of the minds and actively worked together toward this objective.

192. Multiple overt acts were committed. A substantial act or substantial effect from the conspiracy occurred in Texas. DEFENDANTS knew of the acts to be committed in Texas and the impact in Texas of acts done elsewhere in furtherance of the conspiracy. The act in, and effect on, Texas was a direct and foreseeable result of the conduct in furtherance of the conspiracy.

193. Damage resulted to the PLAINTIFF from acts done in furtherance of the common design. The PLAINTIFF has been caused pain and suffering, emotional distress, lost enjoyment of life, loss of his marriage, loss of his relationship with his family, loss of his home, severe damage to his reputation, damage to his career, and more. The PLAINTIFF's business relationships have been severely damaged. The PLAINTIFF's reputation is now sullied by a

massive amount of absolutely false, defamatory information online. This defamation likely can never be erased because it is breeding in cyberspace.

COUNT XII – CONSPIRACY TO COMMIT INVASION OF PRIVACY

194. The facts in paragraphs 1-193 are incorporated herein.

195. The elements for civil conspiracy under Texas law are: (1) two or more persons, (2) an object to be accomplished, (3) a meeting of the minds on the object or course of action, (4) one or more unlawful, overt acts, and (5) damages as the proximate result.

196. DEFENDANTS conspired to invade the privacy of the PLAINTIFF.

197. DEFENDANTS formed and operated the conspiracy. The object to be accomplished was to invade the privacy of the PLAINTIFF, embarrass, humiliate, imitate, defame, libel, slander, harass, cyberstalk, falsely charge the PLAINTIFF with felonies, cause emotional distress, and damage the PLAINTIFF. Evidence shows that DEFENDANTS had a meeting of the minds and actively worked together toward this objective.

198. Multiple overt acts were committed. A substantial act or substantial effect from the conspiracy occurred in Texas. DEFENDANTS knew of the acts to be committed in Texas and the impact in Texas of acts done elsewhere in furtherance of the conspiracy. The act in, and effect on, Texas was a direct and foreseeable result of the conduct in furtherance of the conspiracy.

199. Damage resulted to the PLAINTIFF from acts done in furtherance of the common design. The PLAINTIFF has been caused pain and suffering, emotional distress, lost enjoyment of life, loss of his marriage, loss of his relationship with his family, loss of his home, severe damage to his reputation, damage to his career, and more. The PLAINTIFF's business

relationships have been severely damaged. The PLAINTIFF's reputation is now sullied by a massive amount of absolutely false, defamatory information online. This defamation likely can never be erased because it is breeding in cyberspace.

COUNT XIII – MALICE

200. The facts in paragraphs 1-199 are incorporated herein.

201. Malice includes two elements: (1) viewed objectively from the actor's standpoint, the act or omission must involve an extreme degree of risk, considering the probability and magnitude of the potential harm to others, and (2) the actor must have actual, subjective awareness of the risk involved, but nevertheless proceed in conscious indifference to the rights, safety, or welfare of others.

202. There was extreme risk by the DEFENDANTS as there was not a remote possibility of injury or even a high probability of minor harm, but rather the likelihood of serious injury to the PLAINTIFF.

203. Actual awareness existed because the DEFENDANTS knew about the peril, but their acts demonstrated that they did not care. In fact, DEFENDANTS have bragged online that their acts damaged the PLAINTIFF.

PUNITIVE DAMAGES

204. The facts in paragraphs 1-203 are incorporated herein.

205. The DEFENDANTS acted intentionally to damage the PLAINTIFF. The DEFENDANTS committed fraud, malice, and gross negligence. This isn't the case of someone slipping up and making one false statement. The actions of the DEFENDANTS were deliberate.

DEFENDANTS' conduct, as described above is willful, wanton, wicked, intentional, and malicious resulting from fraud, insult, and malice, and it is associated with aggravating circumstances, including willfulness, wantonness, malice, oppression, outrageous conduct, insult, and fraud, thus warranting the PLAINTIFF's recovery of punitive damages from the DEFENDANTS. The PLAINTIFF should receive an award of punitive damages. Exemplary damages serve to provide the claimant with recovery above and beyond compensatory damages in order to punish the wrongdoer for egregious conduct and to deter the wrongdoer and others from similar conduct in the future. Since the PLAINTIFF's damages can never be erased in this case; there is no amount of money that could compensate the PLAINTIFF for the loss of the loves of his life, his wife, children, and grandchildren; there is no amount of money to compensate a decent, honest, law-abiding citizen for the destruction of his reputation.

JURY TRIAL

PLAINTIFF demands a jury trial.

PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF requests that the DEFENDANTS be cited to appear and answer, and that on final trial, PLAINTIFF has the following:

- a. Judgment against DEFENDANTS for economic, pecuniary, lost profits, consequential, and incidental damages;
- b. By reason of DEFENDANTS' knowing and intentional conduct, mental anguish damages in an amount within the jurisdictional limits of the Court;
- c. Prejudgment interest as provided by law;
- d. Exemplary and punitive damages appropriate to deter any future willful conduct;

- e. Attorney's fees;
- f. Costs of suit;
- g. Post-judgment interest as provided by law;
- h. An Order that DEFENDANTS remove all false information regarding PLAINTIFF from the Internet;
- i. An Order that DEFENDANTS retract all false statements made by Defendants regarding PLAINTIFF;
- j. An Order that DEFENDANTS cease all false statements regarding PLAINTIFF; and
- k. Such other and further relief to which PLAINTIFF may be justly entitled.

Submitted this 21st day of November, 2013,



William M. Windsor

110 E Central Street #1213 * Madison, SD 57042

Email: nobodies@att.net, Phone: 770-578-1094

VERIFICATION OF WILLIAM M. WINDSOR

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification on behalf of himself and that the facts alleged in the foregoing VERIFIED PETITION are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

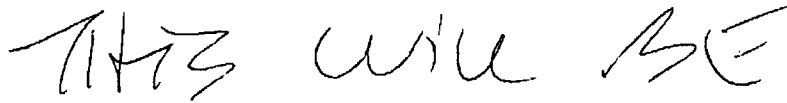
I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 21st day of September, 2013.



William M. Windsor

Sworn and subscribed before me this 21st day of September, 2013.



Notary Public

NOTARIZED WITH
FILED.

Exhibit

B

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

FIRST AMENDED VERIFIED PETITION

William M. Windsor ("Windsor" or "Plaintiff") hereby files his FIRST AMENDED VERIFIED PETITION. Windsor shows the Court as follows:

DISCOVERY

1. Discovery shall be pursuant to Level 3 due to the large number of defendants involved, the fact that many defendants are known only by Internet screen names, and the expectation that defendants will avoid service and will work to subvert the discovery process. The Plaintiff will proceed with discovery pursuant to Level 2, but has petitioned the Court for modification.

SUMMARY

2. William M. Windsor brings this suit against all Defendants for civil conspiracy and for committing the following acts against Plaintiff: defamation, invasion of privacy, intentional infliction of emotional distress, and tortious interference with contractual relations and prospective business. This controversy stems from a small group of people who object to

the Plaintiff's lawful work as an activist fighting dishonesty and injustices of various types. The Plaintiff's activities did not directly involve the Defendants when the conspiracy began. Nevertheless the Defendants became aware of the Plaintiff and his organization and have acted with malice to destroy the Plaintiff and his efforts. Members of the group have repeatedly expressed this as their goal. Defendants have used thousands of published articles and comments. Published statements that the Plaintiff is a pedophile, a pedophile lover, anti-gay, bigoted, a tax evader, a criminal operating a scam, a terrorist, a sexual deviant, a liar, a con man, and much more are false, and this constitute defamation, slander, libel, intentional infliction of emotional distress, negligence, and malice. As a result of actions of Defendants and her fear of bodily harm and stalking, the Plaintiff's wife of 42 years has divorced him. For the same reasons, his children no longer have anything to do with him, and the Plaintiff is not allowed to have any communication with his granddaughters. The Plaintiff no longer has a home. The Plaintiff does not have a paying job. The Plaintiff's reputations as a person and as a business professional have been irreparably damaged.

JURISDICTION AND VENUE

3. This case involves an amount in controversy that is within the jurisdictional limits of this Court. Defendant Brannon Bridge ("Bridge") resides in Ellis County Texas, has a place of business or of employment in Ellis County Texas; and a substantial part of the causes of action arose in Ellis County Texas. The Texas Civil Practice and Remedies Code also provides that "In a suit in which the Plaintiff has established proper venue against a defendant, the court also has venue of all the defendants in all claims or actions arising out of the same transaction, occurrence, or series of transactions or occurrences." Furthermore, the Texas Long Arm Statute

provides jurisdiction over any party who commits a tort in whole or in part in this state.

Therefore, this Court has jurisdiction, and venue is proper in Ellis County, Texas.

PARTIES

4. Plaintiff William M. Windsor (“Windsor” or “Plaintiff”) is an individual whose address is 110 E Center Street #1213, Madison, SD 57719.

5. Defendant Joeyisalittlekid (“JOEYISALITTLEKID”) is an entity that does not have a known address. JOEYISALITTLEKID is an organization that does not appear to be registered as a legal entity; does not appear to have filed an assumed name certificate; and does not appear to have designated an agent for service of process anywhere in the United States. But JOEYISALITTLEKID operates a website, a radio program, and has a virtual clubhouse where its members meet. The Texas Secretary of State is an agent for service of process or complaint on a nonresident who is required by statute to designate or maintain a resident agent or engages in business in this state, but has not designated or maintained a resident agent for service of process. JOEYISALITTLEKID may be served at Secretary of State, State of Texas, 1100 Congress, Capitol Bldg., Room 1E.8, Austin, Texas 78701.

6. Defendant Joeyisalittlekid.blogspot.com (“JoeyBlog”) is an entity whose address is c/o Google, 1600 Amphitheatre Parkway, Mountain View, CA 94043. The registered agent for Google is CSC – Lawyers Incorporating Service, 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833.

7. Defendant Megan Van Zelfden (“MVZ”) is an individual whose address is 6445 Love Drive #2041, Irving, TX 75034.

8. Defendant Brannon Bridge (“Bridge”) is an individual whose address is 3 Maree Court, Waxahachie, TX 75065.

9. Defendant Curtis Butler ("Butler") is an individual whose address is 4604 Lilac Ln, Victoria, TX 77904.

10. Defendant Sean D. Fleming ("Fleming") is an individual whose address is 27120 Barrington Street, Madison Heights, MI 48071.

11. Defendant Albert J. Fiorini ("Fiorini") is an individual whose address is 505 Promontory Drive West, Newport Beach, CA 92660.

12. Defendant Lisa Jones ("Jones") is an individual whose address is 5121 Pearson Rd, Santa Fe, TX 77517.

13. Defendant Sam Round ("Round") is an individual whose address is 6733 Highway 155 N, Stockbridge, GA 30281.

14. Defendant Kellie McDougald ("McDougald") is an individual whose address is 703 E 11th St, Kemp, TX 75143.

15. Defendant Brandy Owen ("Owen") is an individual whose address is 4074 Kaspar Lane, Ennis, TX 75119.

16. Defendant Michelle Stilipec ("Stilipec") is an individual whose address is 8110 B Lawson Loop, Fort Meade, Maryland 20755.

17. Defendant Sean M. Boushie ("Boushie") is an individual whose address is 570 Grandview Drive, Stevensville, Montana 59870.

18. Defendant Allie Overstreet ("Overstreet") is an individual whose address is 1208 N Main, Higginsville, Missouri 64037.

19. Defendant Claudine Dombrowski ("Dombrowski") is an individual whose last known address is c/o Kansas Secretary of State's Safe at Home Program, Memorial Hall, First Floor, 120 SW 10th Avenue, Topeka, KS 66602-1594.

20. Defendant American Mothers Political Party (“AMPP”) is an entity that does not have a known address. AMPP is an organization that does not appear to be registered as a legal entity; does not appear to have filed an assumed name certificate; and does not appear to have designated an agent for service of process anywhere in the United States. But AMPP operates a website, a radio program, conducts meetings, and is very active on Facebook. The Kansas Secretary of State is an agent for service of process or complaint on an entity that is required by statute to designate or maintain a resident agent or engages in business in Kansas, but has not designated or maintained a resident agent for service of process. AMPP may be served at Secretary of State, State of Kansas, 120 SW 10th Avenue, Topeka, KS 66602-1594.

21. Defendants Joey Does 1 to 1000 (“Joey Does”), are individuals whose names and locations are presently unknown to Plaintiff. 1,000 is used because it is unknown at this time how many of the screen names used by Joey Does are where a person uses multiple screen names. All of the Defendants may be jointly referred to as “Defendants” or “Joeys.”

PLAINTIFF’S BACKGROUND

22. In 2010, the Plaintiff had been married 39 years, with two grown children and two grandchildren, retired from a successful career as an entrepreneur and corporate CEO. The same year, the Plaintiff began to use the Internet to join with like-minded individuals in pursuit of his political interests. The Plaintiff developed a website for and founded an organization called Lawless America. In furtherance of the organization’s interests, the Plaintiff spent 241 days traveling across 49 states filming a documentary, and he spent tens of thousands of dollars on production of videos and the film to bring awareness of the group’s concerns. But in December 2012, the Plaintiff learned that he and his work had been targeted for destruction by a group of people that were complete strangers to him, JOEYISALITTLEKID.

DEFENDANTS' BACKGROUND

23. Upon information and belief, a small group of people created "JOEYISALITTLEKID" as a club with an online gathering place for 8-10 people who shared a dislike for Joey Dauben. The club's online meeting place was originally on a Wordpress internet site. But upon information and belief, objections were made that the site was a hate site, and Wordpress terminated the account. Joeyisalittlekid then began publishing at Google's Blogspot.com.

24. Articles are written most days using the screen name "Ginger Snap" as the author, and various Joeys, as well as members of the general public, add as many as hundreds of published comments per day under the articles. Each article with the comments is stored as a single web page, in chronological order. The website currently shows each page dating back to November 19, 2012. In addition to "Ginger Snap," "Ollie Reader" is listed as a contributor, and articles sometime appear under this name.

25. Many of the Joeys are located in Ellis County or North Texas. The Plaintiff first learned of JOEYISALITTLEKID in December 2012 when advised that information negative about the Plaintiff was being published on <http://joeyisalittlekid.blogspot.com>.

26. Upon information and belief, when it appeared that Joey Dauben would be convicted and there was no more case to follow, the group turned its attention to the Plaintiff and others associated with the Plaintiff, apparently because they learned the Plaintiff had been approached by Dauben's girlfriend and family to do some filming about his story.

STATEMENT OF FACTS

27. The Plaintiff publishes an online magazine, produces and hosts a radio show, and has been producing and directing a documentary film about injustices of various types. The

Plaintiff has filmed thousands of videos, and over 1,200 are currently published on his YouTube Channel, and his Livestream channel plays news videos 24-hours-a-day seven-days-a-week.

28. In December 2012, the Plaintiff became aware of JOEYISALITTLEKID, joeyisalittlekid.blogspot.com, and individuals known as the Joeys. Since that time, the Plaintiff has learned that this group has conspired to destroy his reputation, his family, his organization, and his business plans. The group has worked for over a year to interfere in virtually every aspect of the Plaintiff's life. These actions include stalking, harassment, defamation, libel, slander, invasion of privacy, bogus criminal charges against him, and threats (including some death threats).

29. The stalking of the Plaintiff includes defamation and the making of false accusations and false statements.

30. The defamation and the making of false accusations and false statements about the Plaintiff include that the Plaintiff is a pedophile, a pedophile lover, anti-gay, bigoted, a tax evader, a criminal operating a scam, a terrorist, a sexual deviant, a liar, a con man, and much more.

31. The claims that the Plaintiff is a pedophile, a pedophile lover, anti-gay, bigoted, a tax evader, a criminal operating a scam, a terrorist, a sexual deviant, a liar, and a con man are false, and this constitutes defamation, defamation per se, slander, slander per se, libel, intentional infliction of emotional distress, negligence, conspiracy, and stalking.

32. The libel, slander, defamation, and stalking of the Plaintiff are extreme.

33. Defendants have created blogs about the Plaintiff containing defamatory content, including some that utilize the Plaintiff's name and names associated with the Plaintiff. Thus

far, the Plaintiff has identified dozens of websites set up specifically to defame him and incite people who read the sites. These sites include the following:

1. <http://i-am-a-pedophile-william-windsor.blogspot.com>
2. <http://william-windsor.blogspot.com/>
3. <http://i-am-a-pedophile-william-windsor.blogspot.com/>
4. <http://tiny-penis-bill-windsor.blogspot.com/>
5. <http://terrorist-billwindsor-lawlessamerica.blogspot.com/>
6. <http://stalker-williamwindsor.blogspot.com/>
7. <http://lawlessamerica-domesticterrorist.blogspot.com/>
8. <http://lawlessamerica-cult.blogspot.com/>
9. <http://i-suck-dick-bill-windsor.blogspot.com/>
10. <http://i-have-no-balls-bill-windsor.blogspot.com/>
11. <http://sexual-pervert-bill-windsor.blogspot.com/>
12. <http://pedophile-bill-windsor.blogspot.com/>
13. <http://bill-windsor.blogspot.com/>
14. <http://bill-windsor.blogspot.com/>
15. <http://bill-windsor-sexual-deviant.blogspot.com/>
16. <http://www.facebook.com/uglyamericanz>
17. <http://www.facebook.com/babs.windsor.35>
18. <http://www.facebook.com/barbara.windsor.134>
19. <http://www.facebook.com/billwindsor.files>
20. <http://www.facebook.com/billwindsore>
21. <http://www.facebook.com/bill.windsor.33>
22. <http://www.facebook.com/ceaseanddesistbillwindsor>
23. <http://www.facebook.com/pages.exposing-bill-windsor>
24. <http://www.facebook.com/pages/lawless-america-is-a-fraud>
25. <http://www.facebook.com/pages-lawless-america-the-movie-scam>
26. <http://www.facebook.com/lawlessisascam>
27. <http://williamwindsor-sexualpredator.blogspot.com/>
28. <http://www.facebook.com/lawlessnomore>
29. <http://www.facebook.com/mary.windsor.102>
30. <http://www.facebook.com/walter.windsor.96>
31. <http://www.facebook.com/billwindsorisafraudandliesouttheass>
32. <http://amothersintelligencesecretservice.blogspot.com/2013/06/my-name-is-bill-windsor-i-am-sexual.html>
33. <http://thetruthaboutthefamilycourt.blogspot.com/2013/06/my-name-is-bill-windsor-i-am-sexual.html>
34. <http://abuserrightsfatherrights.blogspot.com>
35. <http://amothersintelligencesecretservice.blogspot.com/>
36. <http://www.kscourtwhores.blogspot.com/>
37. <http://thetruthaboutthefamilycourt.blogspot.com>
38. <http://claudinedombrowski.blogspot.com>
39. <http://glennscult.blogspot.com>

40. <http://bx.businessweek.com/open-government/janice-levinson-using-the-blood-of-battered-mothers-and-children-for-her-personal-gain/7420065467279087640-54223d6685f4e599a8d5d17d4bb694b9/>
41. <http://amotherstelligencesecretservice.blogspot.com/2013/06/my-name-is-bill-windsor-i-am-sexual.html>
42. <http://www.kscourtwhores.blogspot.com/2013/06/bill-windsor-sexual-deviant-homeland.html>
43. <http://joeyisalittlekid.blogspot.com/2013/05/sexual-deviant-bill-windsor.html>
44. <http://www.kscourtwhores.blogspot.com/2013/07/announcement-for-all-protective-mothers.html>
45. <http://bx.businessweek.com/profile/claudine-dombrowski/cdombrowski891/>
46. [Bill Windsor – Sexual Deviant, Homeland Terrorist and His Cult Group](#)
47. [Janice Levinson: Using the Blood of Battered Mothers and Children for](#)
48. [Kansas Secretary of State Is not happy with Lawless America](#)
49. [Janice Levinson: When You Play With Wolves](#)
50. [Bill Windsor – Endangering Domestic Violence Victims and Survivors](#)
51. [William M Windsor: An American Terrorist](#)
52. [Bill Windsor – Endangering Domestic Violence Victims and Survivors](#)
53. <http://bx.businessweek.com/open-government/view?url=http%3A%2F%2Fjoeyisalittlekid.blogspot.com%2F2013%2F05%2Fsexual-deviant-bill-windsor.html>
54. <http://bx.businessweek.com/open-government/bill-windsor—sexual-deviant-homeland-terrorist-and-his-cult-group-lawless-america/9132679831200724084-9af7df0d7aabf80a43169c3e40317490/>
55. [Unforgiven Little Bill Death Scene —](#)
<https://www.facebook.com/lorraine.tipton.14>
56. http://batteredmotherscustody.blogspot.com/2013_03_01_archive.html

34. 320 articles have been published thus far on the joeyisalittlekid.blogspot.com website. The totality of the wrongdoing by the Defendants is simply immense. The 320 articles contain approximately 8,000 pages (printed in a very small font size) with an estimate of over 20,000 comments from Joeys and others. A copy of each of the articles and the comments have been filed with the Court as exhibits to the Affidavit of William M. Windsor dated January 7, 2014, referenced and incorporated herein as if attached hereto. Each article shows the date and time written as well as the screen name of the author and the screen names of those who have commented.

35. The task of identifying the wrongdoing of the Defendants is far from over. Discovery is anticipated to uncover much more. Investigation is ongoing, and the Plaintiff reserves the right to add additional claims as discovered.

36. Upon information and belief, prior to November 2012, articles and comments were published on <http://joeyisalittlekid.blogspot.com>, but those articles have been deleted from the Internet. A December 6, 2012 comment by "Oceans" referenced an October article that says Windsor is a new Hitler: <http://joeyisalittlekid.blogspot.com/2012/10/bill-windsor-wants-to-become-new-hitler.html>.

37. In November 2012, articles or comments that defame and demean the Plaintiff in a variety of ways were published on <http://joeyisalittlekid.blogspot.com>, and the cyberstalking of the Plaintiff began.

38. One article on joeyisalittlekid.blogspot.com said the Plaintiff created his movie as part of a con game.

39. Publishing that the Plaintiff created his movie as part of a con game accuses the Plaintiff of criminal activity.

40. The Plaintiff did not create his movie as part of a con game.

41. The Plaintiff is not now and never has been involved in criminal activity.

42. In December 2012, approximately six articles that defame and demean the Plaintiff in a variety of ways were published on <http://joeyisalittlekid.blogspot.com>.

43. In January 2013, approximately 41 articles that defame and demean the Plaintiff in a variety of ways were published on <http://joeyisalittlekid.blogspot.com>.

44. One January 2013 joeyisalittlekid.blogspot.com article says the Plaintiff's movie is a fake.

45. Publishing that the Plaintiff's movie is a fake is false.
46. On or about January 5, 2013 at 11:46 pm, Boushie (using his alias John Smith) published that the Plaintiff had a psychotic break and threatened Boushie.
47. Publishing that the Plaintiff had a psychotic break is false.
48. Publishing that the Plaintiff threatened Boushie is false.
49. On or about January 6, 2013, Boushie (using his John Smith alias on Joeyisalittlekid.blogspot.com) published a statement that implies that he will shoot the Plaintiff if he comes to Montana.
50. In February 2013, approximately 31 articles that defame and demean the Plaintiff in a variety of ways were published on <http://joeyisalittlekid.blogspot.com>.
51. One February 2013 joeyisalittlekid.blogspot.com article claims the Plaintiff's Washington DC event was a disaster.
52. The Plaintiff's Washington DC event was not a disaster.
53. One joeyisalittlekid.blogspot.com article says the Plaintiff is a terrorist.
54. Publishing that the Plaintiff is a terrorist is false.
55. One joeyisalittlekid.blogspot.com article says the Plaintiff has lost his mind.
56. Publishing that the Plaintiff has lost his mind is false.
57. In March 2013, joeyisalittlekid.blogspot.com published approximately 23 articles that defame and demean the Plaintiff in a variety of ways.
58. One joeyisalittlekid.blogspot.com article claims the Plaintiff had a woman sitting on his lap during filming in Michigan and was grabbing her on the ass.
59. Publishing that the Plaintiff had a woman sitting on his lap during filming in Michigan and was grabbing her on the ass is false.

60. On or about March 6, 2013 the Plaintiff published a request for corrections and retractions to defamation, libel, and slander from the Defendants and others.

61. The Plaintiff's published a request for corrections and retractions to defamation, libel, and slander from the Defendants and other was ignored.

62. There have not been any corrections or retractions.

63. On or about midnight on March 11, 2013, the Plaintiff's deceased father's identity was misappropriated, and a Facebook page was set up pretending to be the Plaintiff's father. The page had photos of the Plaintiff's father on his death bed as well as a photo of his coffin at the funeral home. The person or persons pretending to be Walter Windsor posted all types of horrible stuff, including the threat that he, she, or it will post photos of the Plaintiff's mother (who died of breast cancer 35 years ago) having sex with his deceased father. The person or persons pretending to be Walter Windsor posted various messages on the Plaintiff's Facebook page.

64. On or about March 13, 2013, Butler published on Blogspot.com that the Plaintiff is a fraud and a liar.

65. The Plaintiff is not a fraud.

66. The Plaintiff is not a liar.

67. Joeyisalittlekid.blogspot.com and various Defendants have published that the Plaintiff is a con man.

68. Publishing that the Plaintiff is a con man is a criminal charge, and it is false.

69. In March 2013, Overstreet published and reported to the police and to a Missouri judge that the Plaintiff had repeatedly published that he planned to shoot her and a number of people.

70. The Plaintiff never published that he planned to shoot anyone.

71. Overstreet also provided confidential information of the Plaintiff's to Joeeyisalittlekid.blogspot.com. Either Overstreet or another of the Defendants falsified some of this information so it could be used to defame the Plaintiff.

72. On or about March 29, 2013, a wanted poster for the Plaintiff "dead or alive" was published on <http://joeeyisalittlekid.blogspot.com>. The article called the Plaintiff a maniacal monster, among other things.

73. The Plaintiff is not a maniacal monster, among other things.

74. On or about April 9, 2013, the Plaintiff's deceased mother's identity was misappropriated, and a Facebook page pretending to be Plaintiff's mother. The page had a photo that was presented as if it was Plaintiff's mother's skeleton. The person or persons pretending to be Mary Windsor posted various messages on the Plaintiff's Facebook page.

75. The Plaintiff is aware of at least 50 videos that have been created by Defendants and others to defame the Plaintiff, and many of these use the Plaintiff's stolen intellectual property, photographs, and videos. Some of these videos are included on the DVD that is Exhibit 3 to the Affidavit of William M. Windsor dated January 7, 2014, referenced and incorporated herein as if attached hereto.

76. On or about April 10, 2013, Boushie published that the Plaintiff had herpes and was cheating on his wife.

77. The Plaintiff does not now and never has had herpes.

78. The Plaintiff was not cheating on his wife.

79. On or about April 18, 2013, the Plaintiff's identity was misappropriated, and a Facebook page was set up pretending to be the Plaintiff – Bill Windsor. The page had a photo of

the Plaintiff's face on someone else's fat body. The person or persons pretending to be Bill Windsor posted various messages on the Plaintiff's Facebook page as if they were from the Plaintiff.

80. On or about April 18, 2013, a photo of the Plaintiff's father from his death bed is published claiming he is having phone sex with his deceased wife.

81. In April 2013, approximately 20 articles that defame and demean the Plaintiff in a variety of ways were published on <http://joeyisalittlekid.blogspot.com>.

82. In April 2013 joeyisalittlekid.blogspot.com articles and comments say that the Plaintiff is a terrorist. This was written by Ginger Snap at 9:53 am on April 11, 2013. Bridge published a video in that regard at 10:29 am. Dombrowski of the American Mothers Political Party also posted a video, and published that Windsor has a "terrorist cell."

83. The Plaintiff is not a terrorist.

84. In May 2013, joeyisalittlekid.blogspot.com published approximately 17 articles that defame and demean the Plaintiff in a variety of ways.

85. One May 2013 joeyisalittlekid.blogspot.com article says the Plaintiff is a sexual deviant. This was originally written by Ginger Snap at 3:37 pm on May 22, 2013 in an article titled "Sexual Deviant Bill Windsor."

86. The Plaintiff is not a sexual deviant.

87. One May 2013 joeyisalittlekid.blogspot.com comment says the Plaintiff has no concern for the soldiers. This was written by "lawlessnomore" at 10:05 on May 31, 2013. Upon information and belief, "lawlessnomore" is Defendant Stilipec.

88. The Plaintiff is a veteran and has never expressed a lack of concern for soldiers.

89. Another May 2013 joeyisalittlekid.blogspot.com article says the Plaintiff is a liar.

90. The PLAINTIFF is not a liar.

91. Another May 2013 joeyisalittlekid.blogspot.com article says the Plaintiff supports cold-blooded killers.

92. The Plaintiff does not support cold-blooded killers.

93. In May 2013, Butler published on Facebook that the Plaintiff is a liar.

94. The Plaintiff is not a liar.

95. In May 2013, a defendant believed to be Butler or Fleming, using the alias HamRadioJunkie, published on YouTube that the Plaintiff's movie does not and will not exist and that anyone who works with the Plaintiff will have their case destroyed at Joeyisalittlekid.blogspot.com.

96. Publishing that the Plaintiff's movie does not and will not exist is false.

97. In May 2013, Boushie published an offer of a reward for the Plaintiff's murder. Boushie also published that the Plaintiff had been making up information about him for years.

98. The Plaintiff has never made up information about Sean Boushie.

99. On or about May 12, 2013, Boushie published on Facebook page that he predicts it is just a matter of time before the Plaintiff is murdered.

100. On or about May 13, 2013, Sean Boushie published that the Plaintiff would not survive his current movie filming trip.

101. On May 17, 2013, it was published on <http://joeyisalittlekid.blogspot.com> that the Plaintiff's movie is a fake. This was published by "Ginger Snap" at 10:59 am on May 17, 2013. On May 18, 2013 it 8:13, "Yappy" published that the movie was a fake. In may 2013, it was also published that the itinerary with the movie was filled with pedophiles.

102. The Plaintiff's movie is not a fake.

103. The Plaintiff's itinerary with the movie was not filled with pedophiles.

104. On or about May 28, 2013, it was published on <http://joeyisalittlekid.blogspot.com> that the Plaintiff is a sexual deviant.

105. The Plaintiff is not a sexual deviant.

106. On or about May 28, 2013, Claudine Dombrowski published on the Plaintiff's Facebook page that the Plaintiff is a sexual deviant. These statements are false, and this is defamation. When conducting a Google search for the words "Bill Windsor sexual deviant," thousands of web pages were returned. A Google search for "Bill Windsor terrorist" returned 1,600,000 web pages.

107. On or about June 1, 2013, Kimberly Wigglesworth published on YouTube that the Plaintiff was fired for being a crook, is operating a scam, and lies about anything and everything. Kimberly Wigglesworth also published that there is no movie and that the Plaintiff is a monster.

108. The Plaintiff was never fired for being a crook.

109. The Plaintiff is not now and never was operating a scam.

110. The Plaintiff does not lie about anything and everything.

111. The Plaintiff is not a monster.

112. On or about June 4, 2013, an article that is believed to have originated with Joeyisalittlekid.blogspot.com published on Business Week's website that the Plaintiff is a sexual deviant and a terrorist.

113. The Plaintiff is not a sexual deviant.

114. The Plaintiff is not a terrorist

115. In June 2013, Butler threatened to assault or kill the Plaintiff in a video that he recorded and published on YouTube. The video may be seen at: <http://youtu.be/6eHF12jp1KU>.

116. In June 2013, approximately 14 articles that defame and demean the Plaintiff in a variety of ways were published on <http://joeyisalittlekid.blogspot.com>.

117. On or about June 14, 2013, Boushie offered a reward if the Plaintiff was sent to the morgue in Arizona. On June 24, 2013 at 12:22 am, Boushie published that Windsor's body armor would do no good in Montana because what he shoots goes through it like butter. On June 25, 2013 at 7:12 pm, Boushie published on joeyisalittlekid.blogspot.com that he was holding a Kill Bill Movie Marathon.

118. On or about June 14, 2013, Boushie published that the Plaintiff is a liar and falsifies information.

119. The Plaintiff is not a liar.

120. The Plaintiff does not falsify information.

121. On or about June 22, 2013, the Plaintiff's Lawless America Facebook Page was removed by Facebook claiming it included nudity, pornography, and the solicitation of sex.

122. Facebook's claim that the Plaintiff's Lawless America Facebook Page included nudity, pornography, and the solicitation of sex was absolutely false.

123. The loss of this Facebook page has been extremely damaging to the Plaintiff.

124. On or about June 25, 2013, a fake Facebook page was set up in the name of Bill Windsor + e.

125. This fake Bill Windsor + e Facebook page was used to defame the Plaintiff using what appeared to be his own name.

126. In July 2013, joeyisalittlekid.blogspot.com published approximately 17 articles that defame and demean the Plaintiff in a variety of ways.

127. In August 2013, joeyisalittlekid.blogspot.com published approximately 16 articles that defame and demean the Plaintiff in a variety of ways.

128. August 2013, joeyisalittlekid.blogspot.com articles published that the Plaintiff is a pervert and a narcissist.

129. On August 7, 2013 at 12:46 am, "Anonymous" published that there are IP addresses connecting Windsor to searched and hiring of Atlanta and DC escorts.

130. The Plaintiff has never done searched for or hired an Atlanta or DC escort.

131. "Ginger Snap" is shown as the author of an article titled "Pervert on the Run" at 10:25 am on August 26, 2013. This article says Windsor is a pervert. At 10:56 am, "Anonymous" said Windsor is a pervert.

132. The Plaintiff is not a pervert.

133. The Plaintiff is not a narcissist.

134. On August 4, 2013, a car burst into flame and heavy smoke next to the Plaintiff as he was driving in Montana.

135. Boushie claims he fired the shot on August 4, 2013 that caused a car to burst into flame and heavy smoke next to the Plaintiff as he was driving in Montana. Boushie said he missed the Plaintiff.

136. Boushie is a serial cyber-stalker who has terrorized the Plaintiff and his family.

137. Boushie has threatened to hurt or kill the Plaintiff approximately 16 times.

138. Boushie has sent approximately 100 stalking emails to the Plaintiff, filled with obscenities, threats, intimidation, and more.

139. Since May 2012, Boushie has emailed the Plaintiff under various names and email addresses as well as posted online using various names and aliases. He has posted harassing messages, threats, and defamation on Joeyisalittlekid.blogspot.com.

140. The Plaintiff sent several cease and desist emails to Boushie as well as complaints to abuse@yahoo.com and abuse@gmail.com.

141. In September 2013, joeyisalittlekid.blogspot.com published approximately 12 articles that defame and demean the Plaintiff in a variety of ways.

142. On September 3, 2013 at 10:57 am, a joeyisalittlekid.blogspot.com article showing "Ginger Snap" as author says: "I am happy to announce that the scam known as Lawless America is over." Ginger Snap indicated that the Plaintiff's business had died.

143. The Plaintiff's business has not died.

144. A September 2013 joeyisalittlekid.blogspot.com article again says the Plaintiff is a terrorist.

145. The Plaintiff is not a terrorist.

146. On September 13, 2013, Ginger Snap published on joeyisalittlekid.blogspot.com that "Windsor has scammed people all his life."

147. Windsor has not "scammed people all his life."

148. Windsor has not scammed people at all.

149. In October 2013, at least four of the Plaintiff's copyrighted photos are used on joeyisalittlekid.blogspot.com.

150. The published information accompanying the Plaintiff's copyrighted photos are used on joeyisalittlekid.blogspot.com defames and demeans the Plaintiff in a variety of ways.

151. On or about November 19, 2013, joeyisalittlekid.blogspot.com published that the Plaintiff is a terrorist.

152. The Plaintiff is not a terrorist.

153. In November 2013, at least five of the Plaintiff's copyrighted photos are used on joeyisalittlekid.blogspot.com.

154. The published information accompanying the Plaintiff's copyrighted photos are used on joeyisalittlekid.blogspot.com in various humiliating poses as a gnome, a fat man wearing a leotard, and in a kangaroo pouch defames and demeans the Plaintiff in a variety of ways.

155. In addition to the articles published on Joeyisalittlekid.blogspot.com, there are thousands of comments posted by other Defendants, many of whom are listed as Joey Does until their identities can be determined.

156. In addition to Joeyisalittlekid.blogspot.com, Defendants have posted comments on the Plaintiff's Facebook pages and websites.

157. Many published comments on Joeyisalittlekid.blogspot.com and Facebook are defamatory, criminal accusations, and demeaning to the Plaintiff.

158. Upon information and belief, one or more of the Defendants published a false report about the Plaintiff on Rip-Off Report.

159. A report about the Plaintiff on Rip-Off Report contains statements that are false.

160. Defendants published the Plaintiff's copyrighted material in videos on their web pages without permission and maintained the use of this material despite cease and desist notices.

161. Defendants know that the Plaintiff has business relationships and contracts with many people. This was clearly noted in the comments to a December 2012 article on Joeyisalittlekid.blogspot.com.

162. Defendants interfered with the contracts the Plaintiff has with others by giving false, defamatory information to these people and advising them to cease doing business with the Plaintiff.

163. Defendants have conspired to libel, slander, and defame the Plaintiff to put him in a false light and cause him emotional distress.

164. Defendants have been served with numerous cease and desist notices about their cyberstalking and harassment, but they ignore them.

165. There are many hundreds of lies, libelous, slanderous, defamatory statements published online about the Plaintiff by a host of people, many of who use fake names. Those who have libeled, defamed, and stalked the Plaintiff with Joeyisalittlekid.blogspot.com include the named Defendants, and many others.

166. JOEYISALITTLEKID is the organization responsible for massive defamation.

167. joeyisalittlekid.blogspot.com is the primary location for the published defamation and libel.

168. Upon information and belief, MVZ is an owner of JOEYISALITTLEKID and joeyisalittlekid.blogspot.com, and is responsible for a variety of defamatory published statements using various aliases and screen names.

169. Bridge has recorded and published videos that defame, stalk, harass, and threaten the Plaintiff.

170. Butler has recorded and published a video that defames, stalks, harasses, and threatens the Plaintiff.

171. Fleming has published that the Plaintiff is planning to kill government officials. The Plaintiff has never planned to kill anyone, has never discussed killing anyone, has never proposed killing anyone.

172. Fiorini has harassed and defamed the Plaintiff in online published statements.

173. Jones has attempted to steal the Plaintiff's trademark, "Lawless America." She worked to hijack the Plaintiff's Washington DC event, and she has defamed the Plaintiff.

174. Round uses the screen name "Windsor Sluggo" on Joeyisalittlekid.blogspot.com. Sluggo was the character in the Mr. Bill Show who crushed or dismembered Mr. Bill. The Plaintiff has been referred to as "Mr. Bill." ROUND has published defamatory videos about the Plaintiff.

175. McDougald uses the screen name "Petunia Snodgrass." McDougald has been an active member of the JOEYISALITTLEKID club and a publisher of comments designed to generate more comments from others.

176. Upon information and belief, Owen is one of the two primary editors of Joeyisalittlekid.blogspot.com. As "O Reader" or "Ollie Reader," she is responsible for massive defamation of the Plaintiff.

177. Stilipec has stalked, harassed, and defamed the Plaintiff using a variety of screen names, including lawlessnomore. Stilipec has also filed bogus legal complaints against the Plaintiff and his family.

178. Boushie has stalked, harassed, and defamed the Plaintiff using a variety of screen names, including tinyfeetnhands. Boushie has also filed bogus legal complaints against the

Plaintiff, has threatened to kill him, and says he shot at the Plaintiff in Montana in August but missed and hit the car in the next lane.

179. Overstreet has stalked, harassed, and defamed the Plaintiff using screen names, including Allie Gate. Overstreet provided the Plaintiff's confidential information to JOEYISALITTLEKID that was falsified and published on joeyisalittlekid.blogspot.com.

180. The American Mothers Political Party has stalked, harassed, and defamed the Plaintiff, and members have worked actively with JOEYISALITTLEKID.

181. Claudine Dombrowski, President of the American Mothers Political Party ("AMPP"), has stalked, harassed, and defamed the Plaintiff, and she has led AMPP members to work actively with JOEYISALITTLEKID.

182. Joey Does have published thousands of comments in response to defamatory articles about the Plaintiff. They have cyberstalked and harassed the Plaintiff with their continual stream of rude comments, defamation, lies, distortions, and sick humor.

183. Upon information and belief, various Defendants use a variety of fake names online.

184. Listing the facts in this petition is problematic due to the massive amount of information. If the Plaintiff is to list each defamatory comment, the petition will be hundreds of pages long, if not in excess of 1,000 pages. The Plaintiff has over 15 gigabytes of information that includes a perhaps unprecedented case of defamation and conspiracy. The task is compounded further by the fact that discovery is first needed to determine the identified of the screen names and anonymous publishers. And, the Plaintiff is recovering from a fractured skull. The Plaintiff will supplement this petition with a detailed itemization of the defamation by Defendant as soon as possible following discovery.

185. The Plaintiff's life was threatened a number of times in 2012 and 2013.

186. The Plaintiff believes many of these threats against him were spawned as the result of the many wrongful acts of the Defendants.

187. The Plaintiff is the victim of severe emotional distress. As a result of all of this, the Plaintiff's wife of 42 years has divorced him. The reason she gave for the divorce was her fear of harm from Defendants of others and the feeling that she might be safer if she were no longer around the Plaintiff. The Plaintiff's children no longer have anything to do with him, and the Plaintiff is not allowed to have any communication with his granddaughters because his children fear for their safety and the safety of the grandchildren from harm done by Defendants or others. The Plaintiff no longer owns a home. The Plaintiff does not have a paying job.

PLAINTIFF'S ALLEGATIONS

188. Each of the defamatory statements referenced above harmed Plaintiff's reputation and business and caused emotional damages.

189. At all times, each Defendant knew that the statements referenced above were false and defamatory. Each statement was made with malice and negligence.

190. What the Defendants have done is libel and defame the Plaintiff again and again and again in written and other graphic form tend to injure the Plaintiff's reputation and thereby expose the Plaintiff to public hatred, contempt or ridicule, or financial injury or to impeach his honesty, integrity, virtue, or reputation. Reading joeyisalittlekid.blogspot.com shows how the Plaintiff has been subjected to public hatred, contempt, and ridicule.

191. Published statements about the Plaintiff that are false and defamatory include that the Plaintiff is a pedophile, is a pedophile lover, is anti-gay, is a bigot, is a tax evader, is a criminal operating a scam, is a terrorist, is a sexual deviant, has had sex with animals, is a liar, is

a con man, is a con artist, is a huckster, created movie as part of a con game, is conning people, is a fraud, is Hitler, is Hitler-like, is psychotic, claims he has a movie but it is a fake, had a psychotic break, threatened people with physical harm, is a dickless coward, is mentally ill, wants payoffs from people to not extort them on you tube, has published complete lies, has published a distortion of any reality, is mentally disturbed, is showing a distorted one sided view of every story, is showing lies, is showing less than half truth, is not intelligent, is of dubious moral character, wants payoffs from people to not extort them on you tube, his business has died, has no significant intellectual skills, is a sociopath, had a woman sitting on his lap during filming in Michigan and was grabbing her on the ass, gets convicted sex offenders to do his filming, is a maniacal monster, has herpes, falsifies information, was cheating on his wife, the Plaintiff and his wife (now ex-wife) are going to jail; supports cold-blooded killers; Plaintiff's Washington DC event was a disaster, is a terrorist, has lost his mind; The Plaintiff "has hurt so many through black mail, coercion and has threatened the safety of so many mothers and their children by sharing their intimate and confidential information." Other published statements that are defamatory include that the Plaintiff's movie does not and will not exist; Plaintiff had been making up information about Sean Boushie for years; the itinerary with the movie was filled with pedophiles; the Plaintiff is a sexual deviant, a sick animal, moral-less, unethical, and a freek; the Plaintiff is a psychopath; The Plaintiff was fired for being a crook, is operating a scam, and lies about anything and everything; there is no movie; the Plaintiff is a monster; anything the Plaintiff is involved with is bound to be a complete lie and a distortion of any reality; He is only showing his mentally disturbed and distorted one sided view of every story, most of it lies and less than half truth; Anyone like the Plaintiff who is stupid enough to support a extortionist, scam

artist, elderly abusing scum like Crystal Cox is obviously not very intelligent and of dubious moral character; The Plaintiff "has scammed people all his life."

192. The Plaintiff has been defamed through false claims, videos (including a Curtis Butler video, Brannon Bridge videos, American Mothers Political Party videos), blogs, websites, radio programs.

193. Obscene and defamatory messages have been published using fake identities such as "Billyisanasshole" as well as fake identities for the Plaintiff, his parents, and his ex-wife.

194. Defamation was committed against the Plaintiff through filing bogus copyright/trademark violation reports with YouTube that caused two videos to be removed and a strike issued against the Plaintiff's YouTube Channel; giving false, defamatory information to people and advising them to cease doing business with the Plaintiff.

195. The Plaintiff has been defamed through the use of copyrighted photos on joeyisalittlekid.blogspot.com and other sites, including in various computer-generated humiliating poses as a gnome, a fat man wearing a leotard, and in a kangaroo pouch.

196. The Plaintiff has been defamed through published comments on Joeyisalittlekid.blogspot.com, a false report about the Plaintiff on Rip-Off Report. A massive amount of additional published statements will be put into the record, and the Plaintiff believes much more will surface in discovery.

197. Defendants have conspired to libel, slander, and defame the Plaintiff to put him in a false light and cause him emotional distress. Statements alleging misconduct in the course of performing his professional duties and accusing the Plaintiff of committing a crime constitute defamation per se.

198. While there have been defamatory statements published in the hundreds, perhaps thousands, the Defendants have undertaken their crusade against the Plaintiff significantly for the purpose of intentional infliction of emotional distress. Emotional distress has been inflicted in the following ways: libel about the PLAINTIFF; slander about the PLAINTIFF; defamation of the PLAINTIFF; stalking of the PLAINTIFF; harassment of the PLAINTIFF; bogus criminal charges made against the PLAINTIFF; cyberstalking of the PLAINTIFF; false accusations made against the PLAINTIFF; monitoring of the PLAINTIFF; threats against the PLAINTIFF; identity theft of the PLAINTIFF; false claims about the PLAINTIFF; videos about the PLAINTIFF; blogs about the PLAINTIFF; websites about the PLAINTIFF; obscenities about the PLAINTIFF; obscenities sent to the PLAINTIFF; emails to the PLAINTIFF; postings about the PLAINTIFF; publishing a photo of the Plaintiff with the words "Con Man" added to the cap he is wearing; Facebook page set up pretending to be the Plaintiff's father; false claims about the PLAINTIFF; publishing that the PLAINTIFF should suck a man's balls; publishing that the PLAINTIFF needs to go fuck himself; publishing a wanted dead or alive poster of the PLAINTIFF; obscene message using a fake identity – Billyisanasshole; publishing threats to harm or kill the PLAINTIFF; Facebook page pretending to be the PLAINTIFF'S mother; posts in the name of the PLAINTIFF'S deceased father; posts in name of the PLAINTIFF'S deceased mother; posts in the PLAINTIFF'S name; published statements encouraging people to watch the movie "Kill Bill;" Facebook page pretending to be Plaintiff; photo of the PLAINTIFF'S father from his death bed that was published claiming he is having phone sex with his deceased wife; publishing notice that anyone who works with the PLAINTIFF will have their case destroyed at Joeeyisalittlekid.blogspot.com; Curtis Butler video; Brannon Bridge videos; American Mothers Political Party videos; fake Bill Windsor + e Facebook page used to defame the PLAINTIFF

using what appeared to be his own name; firing a shot at the PLAINTIFF on August 4, 2013 that caused a car to burst into flame and heavy smoke next to the Plaintiff as he was driving in Montana; sending stalking emails; filing bogus copyright/trademark violation reports with YouTube that caused two videos to be removed and a strike issued against the PLAINTIFF'S YouTube Channel; giving false, defamatory information to people and advising them to cease doing business with the PLAINTIFF; using the PLAINTIFF'S copyrighted photos on JOEYISALITTLEKID.Blogspot.com; using the PLAINTIFF'S copyrighted photos on JOEYISALITTLEKID.Blogspot.com in various humiliating poses as a gnome, a fat man wearing a leotard, and in a kangaroo pouch; publishing comments on Joeyisalittlekid.blogspot.com; filing a false report about the PLAINTIFF on Rip-Off Report; conspiring to libel, slander, and defame the Plaintiff to put him in a false light and cause him emotional distress. Statements published about the PLAINTIFF that caused intentional infliction of emotional distress include the following: the PLAINTIFF is a huckster; created movie as part of a con game; is a fraud; is Hitler or Hitler-like; is a maniacal monster; his movie is a fake; had a psychotic break; threatened people with physical harm; is a dickless coward; is mentally ill; PLAINTIFF'S Washington DC event was a disaster; is a terrorist; has lost his mind; is a con man; is a liar; has no significant intellectual skills; is a sociopath; falsifies information; had a woman sitting on his lap during filming in Michigan and was grabbing her on the ass; is conning people; is a con man; the Plaintiff "has hurt so many through black mail, coercion and has threatened the safety of so many mothers and their children by sharing their intimate and confidential information;" is a fraud; is a con artist; is a liar; the PLAINTIFF and his wife (now ex-wife) are going to jail; is a psychotic; gets convicted sex offenders to do his filming; has herpes; was cheating on his wife; is a sexual deviant; supports cold-blooded killers; the

PLAINTIFF'S movie does not and will not exist; reward for the PLAINTIFF's murder; PLAINTIFF had been making up information about Sean Boushie for years; offering a reward for the PLAINTIFF'S murder; the itinerary with the movie was filled with pedophiles; the Plaintiff is a sexual deviant, a sick animal, moral-less, unethical, and a freek; PLAINTIFF is a psychopath; was fired for being a crook; is operating a scam; lies about anything and everything; there is no movie; the Plaintiff is a monster; anything William Windsor is involved with is bound to be a complete lie and a distortion of any reality; he is only showing his mentally disturbed and distorted one sided view of every story, most of it lies and less than half truth; anyone stupid enough to support a extortionist, scam artist, elderly abusing scum like Crystal Cox is obviously not very intelligent and of dubious morals character; wants payoffs from people to not extort them on you tube; has published complete lies; has published a distortion of any reality; is mentally disturbed; is showing a distorted one sided view of every story; is showing lies; is showing less than half truth; is not intelligent; is of dubious moral character; wants payoffs from people to not extort them on you tube; the PLAINTIFF'S business has died; the PLAINTIFF "has scammed people all his life.

199. And the Defendants made thousands upon thousands of comments that tortuously interfered with contracts, business expectancy, and prospective business relationships. The defendants set out to hurt the Plaintiff, and they succeeded. Tortious interference has been committed through blogs, through websites, on videos, on radio shows, in online posts. Published statements that constituted tortious interference include that the PLAINTIFF is a huckster; created movie as part of a con game; is a fraud; is Hitler or Hitler-like; movie is a fake; had a psychotic break; has threatened people with physical harm; is a dickless coward; is mentally ill; his Washington DC event was a disaster; is a terrorist; lost his mind; is a con man; is

a liar; has no significant intellectual skills; is a sociopath; had a woman sitting on his lap during filming in Michigan and was grabbing her on the ass; is conning people; is a con man; has hurt many people through blackmail, coercion, and has threatened the safety of so many mothers and their children by sharing their intimate and confidential information; is a con artist; is a liar; is a psychotic; is a maniacal monster; gets convicted sex offenders to do his filming; has herpes; was cheating on his wife; is a sexual deviant; supports cold-blooded killers; his movie does not and will not exist; has been making up information about Sean Boushie for years; the itinerary with the movie was filled with pedophiles; is a sexual deviant; is a sick animal; is moral-less; is unethical; is a freck; is a psychopath; was fired for being a crook; is operating a scam; lies about anything and everything; there is no movie; is a monster; falsifies information; wants payoffs from people to not extort them on YouTube; has published complete lies; has published a distortion of any reality; is mentally disturbed; is showing a distorted one sided view of every story; is showing lies; is showing less than half truth; is not intelligent; is of dubious moral character; his business has died; has scammed people all his life. Actions taken that constituted tortious interference include the following: publishing a photo of the PLAINTIFF with the words "Con Man" added to the cap he is wearing; making false claims about the PLAINTIFF; publishing that the PLAINTIFF and his wife (now ex-wife) are going to jail; publishing a wanted dead or alive poster about the PLAINTIFF; publishing obscene messages using fake identities, such as Billyisanasshole; publishing posts in the name of the PLAINTIFF'S deceased father; publishing posts in name of the PLAINTIFF'S deceased mother; publishing posts in the PLAINTIFF'S name; publishing that anyone who works with the PLAINTIFF will have their case destroyed at oeyisalittlekid.blogspot.com; publishing the issuance of a reward for the PLAINTIFF's murder; Curtis Butler video; Brannon Bridge videos; American Mothers Political

Party videos; publishing that anything the PLAINTIFF is involved with is bound to be a complete lie and a distortion of any reality; publishing that the PLAINTIFF is only showing his mentally disturbed and distorted one sided view of every story, most of it lies and less than half truth; publishing that anyone like the PLAINTIFF who is stupid enough to support a extortionist, scam artist, elderly abusing scum like Crystal Cox is obviously not very intelligent and of dubious morals character; using a fake Bill Windsor + e Facebook page to defame the PLAINTIFF using what appeared to be his own name; filing bogus copyright/trademark violation reports with YouTube that caused two videos to be removed and a strike issued against the PLAINTIFF'S YouTube Channel; giving false, defamatory information to people and advising them to cease doing business with the PLAINTIFF; using the PLAINTIFF'S copyrighted photos without permission on JOEYISALITTLEKID.Blogspot.com in various humiliating poses as a gnome, a fat man wearing a leotard, and in a kangaroo pouch; publishing comments on Joeyisalittlekid.blogspot.com; publishing a false report about the PLAINTIFF on Rip-Off Report; conspiring to libel, slander, and defame the Plaintiff to put him in a false light and cause him emotional distress and to interfere with his business relationships and prospective business relations.

200. The PLAINTIFF'S privacy has been invaded in many ways, including the following: Facebook page was set up pretending to be the Plaintiff's father using copyrighted photos from the PLAINTIFF'S deceased father's tribute website; videos by DEFENDANTS using the PLAINTIFF'S copyrighted photos and material; blogs using the PLAINTIFF'S copyrighted property and intellectual property; Facebook page pretending to be the PLAINTIFF using his copyrighted photos and other intellectual property; Facebook page was set up pretending to be PLAINTIFF'S mother; fake Bill Windsor + e Facebook page set up and

used to defame the PLAINTIFF using what appeared to be his own name while using his copyrighted photos and information; filing bogus copyright/trademark violation reports with YouTube that caused two videos to be removed and a strike issued against the PLAINTIFF'S YouTube Channel; claiming the PLAINTIFF has herpes; publishing obscene messages using a fake identity – Billyisanasshole; publishing a copyrighted photo of the PLAINTIFF'S father from his death bed claiming he is having phone sex with his deceased wife; publishing that the PLAINTIFF should suck a man's balls; publishing posts in the name of the PLAINTIFF'S father; PUBLISHING posts in name of the PLAINTIFF'S mother; PUBLISHING posts in THE PLAINTIFF'S name; publishing a copyrighted photo of the PLAINTIFF with the words "Con Man" added to the cap he is wearing; publishing that the PLAINTIFF is a sexual deviant; publishing stalking emails; publishing that the PLAINTIFF supports cold-blooded killers; publishing that the PLAINTIFF needs to go fuck himself; using the PLAINTIFF'S copyrighted photos on JOEYISALITTLEKID.Blogspot.com; publishing the PLAINTIFF'S copyrighted photos are used on JOEYISALITTLEKID.Blogspot.com in various humiliating poses as a gnome, a fat man wearing a leotard, and in a kangaroo pouch; use of the PLAINTIFF'S photos, videos, and materials for which copyright notice had been given; creating videos using the PLAINTIFF'S copyrighted material; using the PLAINTIFF'S copyrighted material on websites; creating websites and blog sites using the PLAINTIFF'S copyrighted material. Private facts about the PLAINTIFF have been publicly disclosed, and totally false personal information has been publicly disclosed. Facts disclosed include alleged sex life, alleged criminal activity, alleged failure to pay taxes, alleged pedophilia, and much more. There is an absolutely false article on Business Week's website created by DEFENDANTS that claims the PLAINTIFF is a sexual deviant. The PLAINTIFF's personal photos, photos of family members, as well as photos

and alleged photos of his family have been published to damage the PLAINTIFF and in violation of his privacy and intellectual property rights. The matters publicized would be offensive to a reasonable person. The disclosures have humiliated the PLAINTIFF. The PLAINTIFF has been portrayed in an absolutely false light to the public.

201. What has been done to the Plaintiff is far more than defamation – libel and slander. The Defendants have conspired to destroy the Plaintiff and his efforts. Even when Defendants were posting somewhat benign comments on Joeyisalittlekid.blogspot.com, they were feeding the frenzy, supporting the conspiracy in its efforts to destroy the Plaintiff. All of the posts on Joeyisalittlekid.blogspot.com, on Facebook, and on other websites served as stalking. Stalking of the Plaintiff took place in many states, and the crime of stalking was committed from at least October 2012 to the present. Specific to Texas law, Defendants have caused the Plaintiff and member of his family to be placed in fear of bodily injury or death or fear that an offense will be committed against the Plaintiff's property. After the demand to stop by the Plaintiff, the Defendants continued the harassing behavior. That harassing behavior was reported to the police as a stalking offense.

COUNT I – LIBEL AND DEFAMATION

202. The facts in paragraphs 1-201 are incorporated herein.

203. Defendants and each of them published false and defamatory words about the Plaintiff.

204. Statements that Defendants have published were communicated to third persons. Many statements have been published online for the world to see.

205. As a direct and proximate cause of the defamatory publications plaintiff's reputation was damaged. Statements made by Defendants have harmed the reputation of

Plaintiff and have lowered him in the estimation of the community and have deterred third persons from associating or dealing with him. People have ceased dealing with the Plaintiff because of the statements.

206. Defendants and each of them were negligent and acted with malice regarding the truth of their statements.

207. The Plaintiff suffered damage as a result of statements by Defendants.

COUNT II – DEFAMATION PER SE

208. The facts in paragraphs 1-207 are incorporated herein.

209. Statements made by Defendants impute the commission of crimes or acts that constitute an indictable offense. Many statements made have accused the Plaintiff of criminal acts. Many statements made by Defendants impute fraud, misconduct, or incompetence in the Plaintiff's business or occupation. Defendants have published false and defamatory words about the Plaintiff. Published statements were false.

210. Statements made by Defendants tend to harm the reputation of Plaintiff and to lower him in the estimation of the community or to defer third persons from associating or dealing with him. People have ceased dealing with the Plaintiff because of the statements. People have chosen not to be involved with the Plaintiff because of the statements.

211. Statements alleging misconduct in the course of performing one's professional duties and accusing someone of committing a crime constitute defamation per se. Statements made by the Defendants were defamatory as a matter of law.

COUNT III – SLANDER

212. The facts in paragraphs 1-211 are incorporated herein.

213. Defendants have orally communicated and published false and defamatory words about the Plaintiff. These words were false. Audio recordings from the Joeyisalittlekid radio program will be put into the record as evidence of the slander.

214. Statements that Defendants have published were communicated to third persons. Many oral statements have been published online for the world to hear.

215. Statements made by Defendants have harmed the reputation of the Plaintiff and have lowered him in the estimation of the community or to defer third persons from associating or dealing with him. People have ceased dealing with the Plaintiff because of the statements. People have chosen not to be involved with the Plaintiff because of the statements.

216. The defamatory statements were made while either acting with actual malice or negligence regarding the truth of the statement.

217. The Plaintiff suffered damage as a result of statements by Defendants.

COUNT IV – SLANDER PER SE

218. The facts in paragraphs 1-217 are incorporated herein.

219. Statements made by Defendants impute the commission of crimes or acts that constitute an indictable offense. Many statements made have accused the Plaintiff of criminal acts.

220. Many statements made by Defendants impute fraud, misconduct, or incompetence in the Plaintiff's business or occupation.

221. Statements alleging misconduct in the course of performing one's professional duties constitute defamation per se. Accusing the Plaintiff of committing a crime constitutes slander per se. Statements made by the Defendants were defamatory as a matter of law.

COUNT V – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

222. The facts in paragraphs 1-221 are incorporated herein.

223. Defendants intentionally or negligently inflicted emotional distress on the Plaintiff. Defendants acted intentionally or recklessly.

224. Conduct of Defendants was extreme and outrageous. These outrageously false, criminal claims would prompt an average member of the community to exclaim "outrageous!"

225. The conduct of Defendants caused the distress.

226. The distress caused was severe emotional distress to the Plaintiff. The outrageous lies, libel, slander, and defamation are bad alone, but the effect on the Plaintiff's life with the loss of his wife, his family, his home, and life as he knew it has caused severe emotional distress.

COUNT VI – TORTIOUS INTERFERENCE WITH CONTRACT
OR BUSINESS EXPECTANCY

227. The facts in paragraphs 1-226 are incorporated herein.

228. The Plaintiff was involved in a valid business relationship. The Defendants knew that the Plaintiff had a valid business relationship with people all over America in filming videos, conducting interviews, and producing a movie. Several of the Defendants signed a contract with the Plaintiff, and they were aware that everyone filmed by the Plaintiff signed the same contract.

229. Defendants were aware of the relationship.

230. Defendants intentionally interfered with the relationship.

231. Defendants acted without justification.

232. Tortious interference has been committed through blogs, through websites, on videos, on radio shows, in online posts.

233. The Plaintiff suffered damages as a direct result of conduct of Defendants.

COUNT VII – TORTIOUS INTERFERENCE
WITH A PROSPECTIVE BUSINESS RELATIONSHIP

234. The facts in paragraphs 1-233 are incorporated herein.

235. The Plaintiff was involved in valid prospective business relationships. The Defendants knew that the Plaintiff had a valid business relationship with people all over America in filming videos, conducting interviews, and producing a movie. The Defendants knew that the Plaintiff had a reasonable probability of entering into a business relationship with people and companies in the motion picture and television industry as well as with people to be filmed.

236. Defendants were aware of the prospective relationships by reading about it on the Plaintiff's websites.

237. Defendants intentionally interfered with the prospective relationships.

238. Defendants acted without justification.

239. Tortious interference has been committed through blogs, through websites, on videos, on radio shows, in online posts.

240. The Plaintiff suffered damages as a direct result of conduct of Defendants.

COUNT VIII – INVASION OF PRIVACY BY MISAPPROPRIATION

241. The facts in paragraphs 1-240 are incorporated herein.

242. Defendants have invaded the Plaintiff's privacy.

243. The Plaintiff's name, personal photos, photos of family members, as well as photos and alleged photos of his family have been published to damage the Plaintiff and in violation of his privacy and intellectual property rights. The matters publicized would be offensive to a reasonable person. The disclosures have humiliated the Plaintiff.

244. The Plaintiff and his parents are identifiable by their names and/or likenesses.

245. The Defendants benefited from the use of the names and likenesses to promote their own websites and their own agendas. The Defendants benefited from the use of the names

and likenesses to deceive others into thinking online published statements and information came from the Plaintiff or his parents. The Defendants benefited from the use of the names and likenesses to defame, embarrass, humiliate, and belittle the Plaintiff. The Defendants benefited from the use of the names and likenesses to damage the Plaintiff's relationship with members of his family.

COUNT IX – INVASION OF PRIVACY

246. The facts in paragraphs 1-245 are incorporated herein.

247. Defendants have given publicity to private, personal matters concerning the Plaintiff.

248. Defendants have invaded the Plaintiff's privacy. The Plaintiff's name has been misappropriated as has the name of his deceased parents. The Plaintiff's photos and intellectual property have been misappropriated many times.

249. Private facts about the Plaintiff have been publicly disclosed, and totally false personal information has been publicly disclosed. The matters publicized would be offensive to a reasonable person. The disclosures have humiliated the Plaintiff. The Plaintiff has been portrayed in an absolutely false light to the public.

COUNT X – CIVIL CONSPIRACY

250. The facts in paragraphs 1-249 are incorporated herein.

251. Defendants conspired to damage the Plaintiff.

252. Defendants formed and operated the conspiracy. The object to be accomplished was to defame, libel, slander, harass, cyberstalk, invade his privacy, falsely charge the Plaintiff with felonies, cause emotional distress, and damage the Plaintiff. Evidence shows that Defendants had a meeting of the minds and actively worked together toward this objective.

253. Multiple overt acts were committed. A substantial act or substantial effect from the conspiracy occurred in Texas. Defendants knew of the acts to be committed in Texas and the impact in Texas of acts done elsewhere in furtherance of the conspiracy. The act in, and effect on, Texas was a direct and foreseeable result of the conduct in furtherance of the conspiracy.

254. Damage resulted to the Plaintiff from acts done in furtherance of the common design. The Plaintiff has been caused pain and suffering, emotional distress, lost enjoyment of life, loss of his marriage, loss of his relationship with his family, loss of his home, severe damage to his reputation, damage to his career, and more. The Plaintiff's business relationships have been severely damaged. The Plaintiff's reputation is now sullied by a massive amount of absolutely false, defamatory information online. This defamation likely can never be erased because it is breeding in cyberspace.

255. There was extreme risk by the Defendants as there was not a remote possibility of injury or even a high probability of minor harm, but rather the likelihood of serious injury to the Plaintiff.

256. Actual awareness existed because the Defendants knew about the peril, but their acts demonstrated that they did not care. In fact, Defendants have bragged online that their acts damaged the Plaintiff.

COUNT XI – STALKING

257. The facts in paragraphs 1-256 are incorporated herein.

258. Defendants have engaged in massive harassing behavior -- conduct directed specifically toward the Plaintiff that was reasonably likely to harass, annoy, alarm, abuse, torment, and/or embarrass the Plaintiff. As a result of the harassing behavior, the Plaintiff reasonably feared for his safety and the safety of his family. Defendants, while engaged in

harassing behavior, by acts or words threatened to inflict bodily injury on the Plaintiff or to commit an offense against the Plaintiff, a member of the Plaintiff's family, or the Plaintiff's property. Videos were recorded threatening to harm the Plaintiff with a hammer, threatening to kill the Plaintiff, and threatening the Plaintiff in a variety of ways. Defendants had the apparent ability to carry out the threats. One member of the conspiracy has taken credit for shooting at the Plaintiff when he was in Montana. Defendants' apparent ability to carry out the threat caused the Plaintiff to reasonably fear for his safety or the safety of his family members.

259. The Plaintiff clearly demanded that Defendants stop the harassing behavior. After the demand to stop by the Plaintiff, Defendants continued the harassing behavior.

260. Harassing behavior was reported to the police in Ellis County Texas, Atlanta Georgia, Lafayette County Missouri, Shawnee County Kansas, Ravalli County Montana, and Missoula County Montana as a stalking offense.

EXEMPLARY AND PUNITIVE DAMAGES

261. The facts in paragraphs 1-260 are incorporated herein.

262. The Defendants acted intentionally to damage the Plaintiff. The Defendants committed fraud, malice, and gross negligence. This isn't the case of someone slipping up and making one false statement. The actions of the Defendants were deliberate. Defendants' conduct, as described above is willful, wanton, wicked, intentional, and malicious resulting from fraud, insult, and malice, and it is associated with aggravating circumstances, including willfulness, wantonness, malice, oppression, outrageous conduct, insult, and fraud, thus warranting the Plaintiff's recovery of punitive damages from the Defendants. The Plaintiff should receive an award of punitive damages. Exemplary damages serve to provide the claimant with recovery above and beyond compensatory damages in order to punish the wrongdoer for

egregious conduct and to deter the wrongdoer and others from similar conduct in the future.

Since the Plaintiff's damages can never be erased in this case; there is no amount of money that could compensate the Plaintiff for the loss of the loves of his life, his wife, children, and grandchildren; there is no amount of money to compensate a decent, honest, law-abiding citizen for the destruction of his reputation.

JURY TRIAL

Plaintiff demands a jury trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Defendants be cited to appear and answer, and that Plaintiff be granted a judgment for all relief to which the Plaintiff deems himself entitled, including the following:

- a. a temporary restraining order, without bond, preliminary injunction, and permanent injunction restraining the DEFENDANTS from publishing any defamatory comments about WINDSOR, and restraining the DEFENDANTS from using any public medium, radio, television, public meetings, internet, and/or any broadcast or print medium to defame the PLAINTIFF;
- b. a temporary restraining order, without bond, preliminary injunction, and permanent injunction restraining the DEFENDANTS from stalking the PLAINTIFF;
- c. an order restraining the DEFENDANTS from operating any website or blog without registering as some form of legal entity with the State of Texas;
- d. an order requiring that Defendants remove all published information about the Plaintiff, his family, his movie, his television show, and his Lawless America efforts from Joeysalittlekid.blogspot.com;
- e. judgment against Defendants for economic, pecuniary, lost profits, consequential, and incidental damages;
- f. by reason of Defendants' knowing and intentional conduct, mental anguish damages in an amount within the jurisdictional limits of the Court;
- g. prejudgment interest as provided by law;

- h. exemplary and punitive damages appropriate to deter any future willful conduct;
- i. attorney's fees;
- j. costs of suit;
- k. post-judgment interest as provided by law;
- l. each Defendant to be jointly and severally liable for damages;
- m. an Order that Defendants retract all false statements made by Defendants regarding the Plaintiff;
- n. an Order that Defendants cease all false statements regarding the Plaintiff; and
- o. such other and further relief to which the Plaintiff may be justly entitled.

Damages are within the jurisdictional limits of the Court. The Plaintiff is seeking monetary relief in excess of \$1,000,000.

Submitted this 14th day of January, 2014,



William M. Windsor

110 E Central Street #1213 * Madison, SD 57042

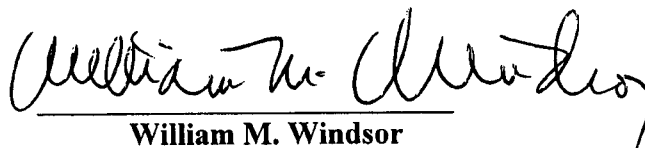
Email: nobodies@att.net, Phone: 770-578-1094

VERIFICATION OF WILLIAM M. WINDSOR

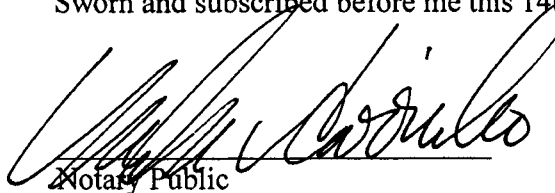
Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification on behalf of himself and that the facts alleged in the foregoing VERIFIED PETITION are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 14th day of January, 2014.


William M. Windsor

Sworn and subscribed before me this 14th day of January, 2014.


Notary Public



Exhibit

C

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

MOTION TO NAME CASEY P. HARGROVE

AND SHONDA HARGROVE AS PARTIES

William M. Windsor ("Windsor" or "Plaintiff") hereby files this MOTION TO NAME CASEY P. HARGROVE AND SHONDA HARGROVE AS PARTIES.

1. Casey P. Hargrove and Shonda Hargrove are believed to be Joey Does who need to be named as defendants. Extensive defamation and participation in the conspiracy is provided in the articles from Joeyisalittlekid.blogspot.com filed with this Court as an exhibit to the MOTION FOR TEMPORARY RESTRAINING ORDER. Casey P. Hargrove and Shonda Hargrove are believed to be "Ginger Snap," the leader of the Joeyisalittlekid group.

2. The Plaintiff obtained information to indicate that Casey P. Hargrove and Shonda Hargrove publish as "Ginger Snap." The Plaintiff knows Casey P. Hargrove's father, Clyde, so he contacted him. The Plaintiff spoke with both Clyde and Casey Hargrove. Clyde Hargrove said their family took an interest in Joeyisalittlekid.blogspot.com because Joey Dauben had

attacked someone they are close to. Casey P. Hargrove denied that he is Ginger Snap, but admitted publishing comments on Joeyisalittlekid.blogspot.com. In an effort to give Casey P. Hargrove and Shonda Hargrove every opportunity to deny that they publish as "Ginger Snap," the Plaintiff sent a series of emails to Clyde and Casey P. Hargrove. True and correct copies of these emails are attached as Exhibit A hereto. The Plaintiff also published a request for affidavits denying involvement. A true and correct copy of this published notice is attached as Exhibit B hereto.

3. Pursuant to Rule 28 of the Texas Rules of Civil Procedure, the Plaintiff hereby moves the Court to substitute the names of Casey P. Hargrove and Shonda Hargrove as named defendants with an address of 213 Rose Garden Way, Red Oak, Texas 75154.

4. A proposed order is attached hereto as Exhibit C.

WHEREFORE, the Plaintiff respectfully requests an order:

- a. that this MOTION is granted;
- b. that Casey P. Hargrove and Shonda Hargrove be substituted as named Defendants; and
- c. that this Court grant any other relief that this Court deems just and proper.

Submitted this 24th day of February, 2014,



William M. Windsor
PO Box 150325, Dallas, TX 75315
email: nobodies@att.net, Phone: 770-578-1094

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing MOTION TO NAME CASEY P.

HARGROVE AND SHONDA HARGROVE AS PARTIES to each Defendant:

JOEYISALITTLEKID
Secretary of State - State of Texas
1100 Congress, Capitol Bldg. Room 1E.8
Austin, Texas 78701

Joeyisalittlekid.blogspot.com
c/o Google
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Megan Van Zelfden
6445 Love Drive #2041
Irving, TX 75034

Brannon Bridge
c/o John M. Perkins III
201 E Main Street – Suite 209, Waxahachie, TX 75165
Phone: 469-765-6516

email: branbri@aol.com.

Curtis Butler
4604 Lilac Ln, Victoria, TX 77904
email: balchspringsbeacon@gmail.com

Sean D. Fleming
c/o Barbara L. Hachenburg
Germer Attorneys at Law
Three Allen Center, 333 Clay Street, Suite 4950, Houston, TX 77002
Phone: 713-650-1313
Fax: 713-739-7420
email: bhachenburg@germer.com

Albert J. Fiorini
505 Promontory Drive West, Newport Beach, CA 92660
email: newportbay@aol.com

Lisa Jones
5121 Pearson Rd, Santa Fe, TX 77517
832-788-4405

Sam Round
6733 Highway 155 N, Stockbridge, GA 30281
email: sroundII@bellsouth.net

Kellie McDougald
703 E 11th St
Kemp, TX 75143

Brandy Owen
4074 Kaspar Lane, Ennis, TX 75119

Michelle Stilipec
8110 B Lawson Loop. Fort Meade, Maryland 20755
Email: jnstilipec@hotmail.com

Sean M. Boushie
570 Grandview Drive. Stevensville, Montana 59870
email: missoulagloryholefun@yahoo.com

Sean M. Boushie
c/o Alison Garab
Sullivan, Tabaracci & Rhoades
1821 S Avenue West, Missoula, MT 59801
406-721-9700

email: alison@montanalawyer.com

Allie Overstreet
1208 N Main, Higginsville, Missouri 64037
email: loverstreet09@yahoo.com

Claudine Dombrowski
c/o Kansas Secretary of State's Safe at Home Program
Memorial Hall, First Floor, 120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

American Mothers Political Party
c/o Secretary of State - State of Kansas
120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

Google, Inc.
Shannon Zmud Teicher
Jackson & Walker
901 Main Street, Suite 6000, Dallas, TX 75202
214-953-6000
steicher@jw.com

This 24th day of February, 2014.



William M. Windsor

PO Box 150325, Dallas, TX 75315
Email: nobodies@att.net
Phone: 770-578-1094

Exhibit

A

Bill Windsor

From: Bill Windsor <Nobodies@att.net>
Sent: Thursday, February 20, 2014 10:57 AM
To: clhargrove@sbcglobal.net
Subject: Windsor and Joeysisalittlekid

Importance: High

Clyde:

I don't want to bother you, but I do want you to know that on Monday, I will be asking Judge Bob Carroll to add Casey and Shonda as parties in my lawsuit.

If Casey and Shonda will sign notarized affidavits stating they have not published statements on Joeysisalittlekid.blogspot.com since November 1, 2012, I will refrain from adding them as parties.

I will be attending the "Meet the Chief" event in Red Oak on Saturday in an effort to speak with city officials and gather more information about the involvement of people from Red Oak.

William M. Windsor
nobodies@att.net
Phone: 770-578-1094
www.LawlessAmerica.org – blog site
www.LawlessAmerica.com
www.facebook.com/lawlessamerica2
www.facebook.com/billwindsor1
www.youtube.com/lawlessamerica
www.imdb.com/title/tt2337260/

Please sign our petition:
<http://www.gopetition.com/petitions/i-support-honesty-in-government-and-the-rights-we-were/sign.html>

Bill Windsor

From: Bill Windsor <Nobodies@att.net>
Sent: Monday, February 17, 2014 4:45 PM
To: justinh22@gmail.com
Cc: clhargrove@sbcglobal.net
Subject: RE: Ginger Snap, will you admit that you are Casey Hargrove

Or confirm that your wife is Ginger Snap.

From: Bill Windsor [<mailto:Nobodies@att.net>]
Sent: Monday, February 17, 2014 4:09 PM
To: justinh22@gmail.com
Cc: clhargrove@sbcglobal.net
Subject: Ginger Snap, will you admit that you are Casey Hargrove
Importance: High

Justinh22@gmail.com, please confirm or deny that you are Casey Hargrove.

William M. Windsor
nobodies@att.net
Phone: 770-578-1094
www.LawlessAmerica.org – blog site
www.LawlessAmerica.com
www.facebook.com/lawlessamerica2
www.facebook.com/billwindsor1
www.youtube.com/lawlessamerica
www.imdb.com/title/tt2337260/

Please sign our petition:
<http://www.gopetition.com/petitions/i-support-honesty-in-government-and-the-rights-we-were/sign.html>

Bill Windsor

From: Bill Windsor <Nobodies@att.net>
Sent: Monday, February 17, 2014 4:45 PM
To: justinh22@gmail.com
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Subject: RE: Ginger Snap, will you admit that you are Casey Hargrove

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To: justinh22@gmail.com
Cc: clhargrove@sbcglobal.net
Subject: Ginger Snap, will you admit that you are Casey Hargrove
Importance: High

Justinh22@gmail.com, please confirm or deny that you are Casey Hargrove.

William M. Windsor
nobodies@att.net
Phone: 770-578-1094
www.LawlessAmerica.org – blog site
www.LawlessAmerica.com
www.facebook.com/lawlessamerica2
www.facebook.com/billwindsor1
www.youtube.com/lawlessamerica
www.imdb.com/title/tt2337260/

Please sign our petition:

<http://www.gopetition.com/petitions/i-support-honesty-in-government-and-the-rights-we-were/sign.html>

Bill Windsor

From: Hargrove Real Estate hargrove <clhargrove@sbcglobal.net>
Sent: Friday, February 14, 2014 3:00 PM
To: Nobodies@att.net
Subject: Re: Bill Windsor & nJoeyisalittlekid.blogspot.com

Thanks, Bill
I will try to read this later.
Clyde L. Hargrove
Hargrove Real Estate
101 Valley Ridge Dr
Red Oak, TX 75154

Phone: 972-617-1100
Fax: 972-617-1104
www.hargroverealestate.net

From: Bill Windsor <Nobodies@att.net>
To: clhargrove@sbcglobal.net
Sent: Friday, February 14, 2014 2:47 PM
Subject: Bill Windsor & nJoeyisalittlekid.blogspot.com

Clyde:

Here is the lawsuit, filed in Ellis County. This is a huge file, so please let me know if you receive it.

I will be deposing Casey, and we will be subpoenaing his work and personal electronic devices for a forensic examination. I'd love to learn that Casey is not involved, but my information comes from an incredibly reliable source.

William M. Windsor
nobodies@att.net
Phone: 770-578-1094

Bill Windsor

From: Bill Windsor <Nobodies@att.net>
Sent: Friday, February 14, 2014 2:47 PM
To: clhargrove@sbcglobal.net
Subject: Bill Windsor & nJoeyisalittlekid.blogspot.com
Attachments: ELLIS-COUNTY-88611-Windsor-v-Joeyisalittlekid-Verified-Petition-First-Amended-2014-01-15.pdf

Clyde:

Here is the lawsuit, filed in Ellis County. This is a huge file, so please let me know if you receive it.

I will be deposing Casey, and we will be subpoenaing his work and personal electronic devices for a forensic examination. I'd love to learn that Casey is not involved, but my information comes from an incredibly reliable source.

William M. Windsor
nobodies@att.net
Phone: 770-578-1094

Bill Windsor

From: Bill Windsor <Nobodies@att.net>
Sent: Saturday, February 15, 2014 8:16 PM
To: 'Hargrove Real Estate hargrove'
Subject: Bill Windsor & Joeyisalittlekid.blogspot.com

Importance: High

Thanks, Clyde. Once again, I am SO SORRY to involve an old friend in this.

Here is some new information that seems to confirm that your son is Ginger Snap.

According to information received from an extremely reliable source, your son has had this account:
<http://www.mylife.com/caseyphargrove>

The email address provided on the Joeyisalittlekid.blogspot.com blog for Ginger Snap is Justin22h@gmail.com. It was previously used as the sign-in email for Casey P. Hargrove's Mylife.com account.

I have received several emails from "Ginger Snap" using justin22h@gmail.com.

It certainly looks like Casey is Ginger Snap.

Bill

From: Hargrove Real Estate hargrove [<mailto:clhargrove@sbcglobal.net>]
Sent: Friday, February 14, 2014 3:00 PM
To: Nobodies@att.net
Subject: Re: Bill Windsor & nJoeyisalittlekid.blogspot.com

Thanks, Bill
I will try to read this later.
Clyde L. Hargrove
Hargrove Real Estate
101 Valley Ridge Dr
Red Oak, TX 75154

Phone: 972-617-1100
Fax: 972-617-1104
www.hargroverestate.net

From: Bill Windsor <Nobodies@att.net>
To: clhargrove@sbcglobal.net
Sent: Friday, February 14, 2014 2:47 PM
Subject: Bill Windsor & nJoeyisalittlekid.blogspot.com

Clyde:

Here is the lawsuit, filed in Ellis County. This is a huge file, so please let me know if you receive it.

I will be deposing Casey, and we will be subpoenaing his work and personal electronic devices for a forensic examination. I'd love to learn that Casey is not involved, but my information comes from an incredibly reliable source.

William M. Windsor
nobodies@att.net
Phone: 770-578-1094

From: Bill Windsor
To: betsi@freedomhorses.org
Subject: Betsi, I am naming you and FreedomHorses in a lawsuit
Date: Monday, February 17, 2014 3:40:34 PM
Importance: High

Please admit or deny that you post on www.joevisalittlekid.blogspot.com.

See www.facebook.com/billwindsor1

I believe you know these sites very well.

William M. Windsor
nobodies@att.net
Phone: 770-578-1094
www.LawlessAmerica.org – blog site
www.LawlessAmerica.com
www.facebook.com/lawlessamerica2
www.facebook.com/billwindsor1
www.youtube.com/lawlessamerica
www.imdb.com/title/tt2337260/

Please sign our petition:
<http://www.gopetition.com/petitions/i-support-honesty-in-government-and-the-rights-we-were/sign.html>

From: [Bill Windsor](#)
To: justinh22@gmail.com
Cc: chargrove@sbcglobal.net
Subject: RE: Ginger Snap, will you admit that you are Casey Hargrove
Date: Monday, February 17, 2014 4:45:27 PM

Or confirm that your wife is Ginger Snap.

From: Bill Windsor [mailto:Nobodies@att.net]
Sent: Monday, February 17, 2014 4:09 PM
To: justinh22@gmail.com
Cc: chargrove@sbcglobal.net
Subject: Ginger Snap, will you admit that you are Casey Hargrove
Importance: High

Justinh22@gmail.com, please confirm or deny that you are Casey Hargrove.

William M. Windsor
nobodies@att.net
Phone: 770-578-1094
www.LawlessAmerica.org – blog site
www.LawlessAmerica.com
www.facebook.com/lawlessamerica2
www.facebook.com/billwindsor1
www.youtube.com/lawlessamerica
www.imdb.com/title/tt2337260/

Please sign our petition:

<http://www.gopetition.com/petitions/i-support-honesty-in-government-and-the-rights-we-were/sign.html>

Exhibit

B

Bill Windsor

February 20

IMPORTANT MESSAGE TO JOEYISALITTLEKID AND THOSE WHO WE BELIEVE WE HAVE IDENTIFIED

I have recently named a number of people who I believe are involved in the Joeyisalittlekid hate group. On Monday, I will be asking Judge Bob Carroll to replace the name of "Joey Does" with the names of these people, if they are not already named Defendants.

I do not want to trouble any innocent people. I would like to give anyone who I have named the opportunity to provide a sworn, notarized affidavit stating that you are not one of the Joeyisalittle kid users. If you have been wrongfully named, you should provide an affidavit.

If you have posted on Joeyisalittlekid.blogspot.com but I have identified you by a screen name that is not correct, simply provide a sworn affidavit with your name, address, email, and phone with this statement:

"I do not now and never have posted anything on the internet using any version of the name _____."

If you were never involved in Joeyisalittlekid, but I have stated that I thought you had been, simply provide a sworn affidavit with your name, address, email, and phone with these statements:

AFFIDAVIT OF _____ DATED FEBRUARY ____, 2014

I, _____, the undersigned, hereby declare under penalty of perjury:

1. I am over the age of 21, am competent to testify, and have personal knowledge of the matters stated herein. I provide this affidavit to be used in this matter and in any other legal proceeding.

2. My address is _____. My telephone is _____.
My email is _____.

3. I have never visited Joeyisalittlekid@blotspot.com.

4. I have never posted or submitted a message of any kind to Joeyisalittlekid@blogspot.com under any screen name.

FURTHER SAITH AFFIANT NOT. I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____ day of February 2014.

VERIFICATION

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, _____, who after being duly sworn deposes and states that he is authorized to make this verification on behalf of himself and that the facts alleged in the foregoing AFFIDAVIT OF _____ DATED _____ are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This ____ day of February 2014.

Printed Name: _____

Sworn and subscribed before me this ____ day of February 2014.

Notary Public

Please go to a bank or some such place and get it notarized. Email a copy to nobodies@att.net, and mail the original to William M. Windsor, PO Box 150325, Dallas, TX 75315

Exhibit

C

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

ORDER GRANTING PLAINTIFF'S MOTION

TO NAME CASEY P. HARGROVE AND SHONDA HARGROVE AS DEFENDANTS

On February 24, 2014, Plaintiff William M. Windsor ("Windsor" or "Plaintiff") filed a MOTION TO NAME CASEY P. HARGROVE AND SHONDA HARGROVE AS PARTIES.

The Court considered the motion and Rule 28 of the Texas Rules of Civil Procedure.

IT IS HEREBY ORDERED that,

- a. The PLAINTIFF'S motion is granted;
- b. Casey P. Hargrove and Shonda Hargrove are added as Defendants.

IT IS SO ORDERED this ____ day of _____, 2014,

Honorable Bob Carroll
Judge, 40th Judicial District Court
Ellis County, Texas

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

MOTION TO NAME KIMBERLY WIGGLESWORTH AS A PARTY

William M. Windsor ("Windsor" or "Plaintiff") hereby files this MOTION TO NAME KIMBERLY WIGGLESWORTH AS A PARTY.

1. Kimberly Wigglesworth is one of the Joey Does who needs to be a named defendant. Extensive defamation and participation in the conspiracy is provided in the articles from Joeyisalittlekid.blogspot.com filed with this Court as an exhibit to the MOTION FOR TEMPORARY RESTRAINING ORDER. Kimberly Wigglesworth is believed to be "Pie Man Zombie Hunter."
2. Pursuant to Rule 28 of the Texas Rules of Civil Procedure, the Plaintiff hereby moves the Court to substitute the name of Kimberly Wigglesworth as one of the named defendants with an address of 26 East Dover Street, Waterbury, CT 06706.
3. A proposed order is attached hereto as Exhibit A.

WHEREFORE, the Plaintiff respectfully requests an order:

- a. that this MOTION is granted;
- b. that Kimberly Wigglesworth be substituted as one of the named Defendants;
and
- c. that this Court grant any other relief that this Court deems just and proper.

Submitted this 24th day of February, 2014,

A handwritten signature in black ink, appearing to read "William M. Windsor", written over a horizontal line.

William M. Windsor

PO Box 150325, Dallas, TX 75315

email: nobodies@att.net, Phone: 770-578-1094

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing MOTION TO NAME KIMBERLY WIGGLESWORTH AS A PARTY to each Defendant:

JOEYISALITTLEKID
Secretary of State - State of Texas
1100 Congress, Capitol Bldg. Room 1E.8
Austin, Texas 78701

Joeyisalittlekid.blogspot.com
c/o Google
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Megan Van Zelfden
6445 Love Drive #2041
Irving, TX 75034

Brannon Bridge
c/o John M. Perkins III
201 E Main Street – Suite 209, Waxahachie, TX 75165
Phone: 469-765-6516

email: branbri@aol.com.

Curtis Butler
4604 Lilac Ln, Victoria, TX 77904
email: balchspringsbeacon@gmail.com

Sean D. Fleming
c/o Barbara L. Hachenburg
Germer Attorneys at Law
Three Allen Center, 333 Clay Street, Suite 4950, Houston, TX 77002
Phone: 713-650-1313
Fax: 713-739-7420
email: bhachenburg@germer.com

Albert J. Fiorini
505 Promontory Drive West, Newport Beach, CA 92660
email: newportbay@aol.com

Lisa Jones
5121 Pearson Rd, Santa Fe, TX 77517
832-788-4405

Sam Round
6733 Highway 155 N, Stockbridge, GA 30281
email: sroundII@bellsouth.net

Kellie McDougald
703 E 11th St
Kemp, TX 75143

Brandy Owen
4074 Kaspar Lane, Ennis, TX 75119

Michelle Stilipec
8110 B Lawson Loop. Fort Meade, Maryland 20755
Email: jmstilipec@hotmail.com

Sean M. Boushie
570 Grandview Drive. Stevensville, Montana 59870
email: missoulagloryholefun@yahoo.com

Sean M. Boushie
c/o Alison Garab
Sullivan, Tabaracci & Rhoades
1821 S Avenue West, Missoula, MT 59801
406-721-9700

email: alison@montanalawyer.com

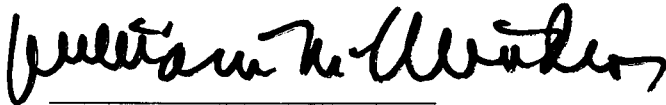
Allie Overstreet
1208 N Main, Higginsville, Missouri 64037
email: loverstreet09@yahoo.com

Claudine Dombrowski
c/o Kansas Secretary of State's Safe at Home Program
Memorial Hall, First Floor, 120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

American Mothers Political Party
c/o Secretary of State - State of Kansas
120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

Google, Inc.
Shannon Zmud Teicher
Jackson & Walker
901 Main Street, Suite 6000, Dallas, TX 75202
214-953-6000
steicher@jw.com

This 24th day of February, 2014.

A handwritten signature in black ink, appearing to read "William M. Windsor", written over a horizontal line.

William M. Windsor

PO Box 150325, Dallas, TX 75315
Email: nobodies@att.net
Phone: 770-578-1094

Exhibit

A

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

ORDER GRANTING PLAINTIFF'S MOTION
TO NAME KIMBERLY WIGGLESWORTH AS A DEFENDANT

On February 24, 2014, Plaintiff William M. Windsor ("Windsor" or "Plaintiff") filed a MOTION TO NAME KIMBERLY WIGGLESWORTH AS A PARTY.

The Court considered the motion and Rule 28 of the Texas Rules of Civil Procedure.

IT IS HEREBY ORDERED that,

- a. The PLAINTIFF'S motion is granted;
- b. Kimberly Wigglesworth is added as a Defendant.

IT IS SO ORDERED this ____ day of _____, 2014,

Honorable Bob Carroll
Judge, 40th Judicial District Court
Ellis County, Texas

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

MOTION TO NAME CHERYL SOSBY AS A PARTY


William M. Windsor ("Windsor" or "Plaintiff") hereby files this MOTION TO NAME CHERYL SOSBY AS A PARTY.

1. Cheryl Sosby is believed to be one of the Joey Does who needs to be a named defendant. Extensive defamation and participation in the conspiracy is provided in the articles from Joeyisalittlekid.blogspot.com filed with this Court as an exhibit to the MOTION FOR TEMPORARY RESTRAINING ORDER. Cheryl Sosby is believed to use at least one of the screen names on Joeyisalittlekid.blogspot.com
2. Pursuant to Rule 28 of the Texas Rules of Civil Procedure, the Plaintiff hereby moves the Court to substitute the name of Cheryl Sosby as one of the named defendants with an address of 2040 Commerce Rd, Lot 12, Athens, Georgia 30607.
3. A proposed order is attached hereto as Exhibit A.

WHEREFORE, the Plaintiff respectfully requests an order:

- a. that this MOTION is granted;
- b. that Cheryl Sosby be substituted as one of the named Defendants; and
- c. that this Court grant any other relief that this Court deems just and proper.

Submitted this 24th day of February, 2014,

A handwritten signature in black ink, appearing to read "William M. Windsor", written over a horizontal line.

William M. Windsor

PO Box 150325, Dallas, TX 75315

email: nobodies@att.net, Phone: 770-578-1094

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing MOTION TO NAME CHERYL SOSBY

AS A PARTY to each Defendant:

JOEYISALITTLEKID
Secretary of State - State of Texas
1100 Congress, Capitol Bldg. Room 1E.8
Austin, Texas 78701

Joeyisalittlekid.blogspot.com
c/o Google
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Megan Van Zelfden
6445 Love Drive #2041
Irving, TX 75034

Brannon Bridge
c/o John M. Perkins III
201 E Main Street – Suite 209, Waxahachie, TX 75165
Phone: 469-765-6516

email: branbri@aol.com.

Curtis Butler
4604 Lilac Ln, Victoria, TX 77904
email: balchspringsbeacon@gmail.com

Sean D. Fleming
c/o Barbara L. Hachenburg
Germer Attorneys at Law
Three Allen Center, 333 Clay Street, Suite 4950, Houston, TX 77002
Phone: 713-650-1313
Fax: 713-739-7420
email: bhachenburg@germer.com

Albert J. Fiorini
505 Promontory Drive West, Newport Beach, CA 92660
email: newportbay@aol.com

Lisa Jones
5121 Pearson Rd, Santa Fe, TX 77517
832-788-4405

Sam Round
6733 Highway 155 N, Stockbridge, GA 30281
email: sroundII@bellsouth.net

Kellie McDougald
703 E 11th St
Kemp, TX 75143

Brandy Owen
4074 Kaspar Lane, Ennis, TX 75119

Michelle Stilipec
8110 B Lawson Loop. Fort Meade, Maryland 20755
Email: jmstilipec@hotmail.com

Sean M. Boushie
570 Grandview Drive. Stevensville, Montana 59870
email: missoulagloryholefun@yahoo.com

Sean M. Boushie
c/o Alison Garab
Sullivan, Tabaracci & Rhoades
1821 S Avenue West, Missoula, MT 59801
406-721-9700

email: alison@montanalawyer.com

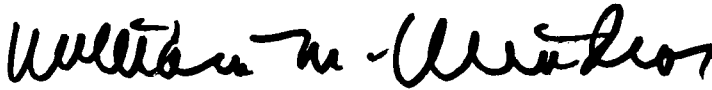
Allie Overstreet
1208 N Main, Higginsville, Missouri 64037
email: loverstreet09@yahoo.com

Claudine Dombrowski
c/o Kansas Secretary of State's Safe at Home Program
Memorial Hall, First Floor, 120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

American Mothers Political Party
c/o Secretary of State - State of Kansas
120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

Google, Inc.
Shannon Zmud Teicher
Jackson & Walker
901 Main Street, Suite 6000, Dallas, TX 75202
214-953-6000
steicher@jw.com

This 24th day of February, 2014.



William M. Windsor

PO Box 150325, Dallas, TX 75315
Email: nobodies@att.net
Phone: 770-578-1094

Exhibit

A

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

ORDER GRANTING PLAINTIFF'S MOTION
TO NAME CHERYL SOSBY AS A PARTY

On February 24, 2014, Plaintiff William M. Windsor ("Windsor" or "Plaintiff") filed a MOTION TO NAME CHERYL SOSBY AS A PARTY.

The Court considered the motion and Rule 28 of the Texas Rules of Civil Procedure.

IT IS HEREBY ORDERED that,

- a. The PLAINTIFF'S motion is granted;
- b. Cheryl Sosby is added as a Defendant.

IT IS SO ORDERED this ____ day of _____, 2014,

Honorable Bob Carroll
Judge, 40th Judicial District Court
Ellis County, Texas

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

MOTION TO NAME BETSI BENDIX AS A PARTY

William M. Windsor ("Windsor" or "Plaintiff") hereby files this MOTION TO NAME BETSI BENDIX AS A PARTY.

1. Betsi Bendix is believed to be one of the Joey Does who needs to be a named defendant. Extensive defamation and participation in the conspiracy is provided in the articles from Joeyisalittlekid.blogspot.com filed with this Court as an exhibit to the MOTION FOR TEMPORARY RESTRAINING ORDER. Betsi Bendix is believed to be "NothingBetterToDoToday," one of the most active of the users on Joeyisalittlekid.blogspot.com
2. The Plaintiff called Betsi Bendix to ask her to admit or deny that she is one of the people who publish on Joeyisalittlekid.blogspot.com, and she hung up on the Plaintiff.
3. The Plaintiff also published a request for affidavits denying involvement. A true and correct copy of this published notice is attached as Exhibit A hereto.

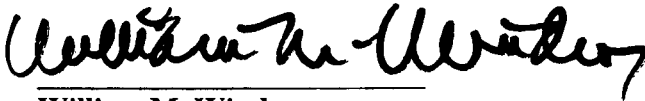
4. Pursuant to Rule 28 of the Texas Rules of Civil Procedure, the Plaintiff hereby moves the Court to substitute the name of Betsi Bendix as one of the named defendants with an address of 510 S Bowie Drive, Weatherford, TX 76086.

5. A proposed order is attached hereto as Exhibit B.

WHEREFORE, the Plaintiff respectfully requests an order:

- a. that this MOTION is granted;
- b. that Betsi Bendix be substituted as one of the named Defendants; and
- c. that this Court grant any other relief that this Court deems just and proper.

Submitted this 24th day of February, 2014,



William M. Windsor
PO Box 150325, Dallas, TX 75315
email: nobodies@att.net, Phone: 770-578-1094

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing MOTION TO NAME BETSI BENDIX

AS A PARTY to each Defendant:

JOEYISALITTLEKID
Secretary of State - State of Texas
1100 Congress, Capitol Bldg. Room 1E.8
Austin, Texas 78701

Joeyisalittlekid.blogspot.com
c/o Google
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Megan Van Zelfden
6445 Love Drive #2041
Irving, TX 75034

Brannon Bridge
c/o John M. Perkins III
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Phone: 469-765-6516

email: branbri@aol.com.

Curtis Butler
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email: balchspringsbeacon@gmail.com

Sean D. Fleming
c/o Barbara L. Hachenburg
Germer Attorneys at Law
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email: newportbay@aol.com

Lisa Jones
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832-788-4405

Sam Round
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email: sroundII@bellsouth.net

Kellie McDougald
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Kemp, TX 75143

Brandy Owen
4074 Kaspar Lane, Ennis, TX 75119

Michelle Stilipec
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Email: jmstilipec@hotmail.com

Sean M. Boushie
570 Grandview Drive. Stevensville, Montana 59870
email: missoulagloryholefun@yahoo.com

Sean M. Boushie
c/o Alison Garab
Sullivan, Tabaracci & Rhoades
1821 S Avenue West, Missoula, MT 59801
406-721-9700

email: alison@montanalawyer.com

Allie Overstreet
1208 N Main, Higginsville, Missouri 64037
email: loverstreet09@yahoo.com

Claudine Dombrowski
c/o Kansas Secretary of State's Safe at Home Program
Memorial Hall, First Floor, 120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

American Mothers Political Party
c/o Secretary of State - State of Kansas
120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

Google, Inc.
Shannon Zmud Teicher
Jackson & Walker
901 Main Street, Suite 6000, Dallas, TX 75202
214-953-6000
steicher@jw.com

This 24th day of February, 2014.



William M. Windsor

PO Box 150325, Dallas, TX 75315
Email: nobodies@att.net
Phone: 770-578-1094

Exhibit

A

Bill Windsor

February 20

IMPORTANT MESSAGE TO JOEYISALITTLEKID AND THOSE WHO WE BELIEVE WE
HAVE IDENTIFIED

I have recently named a number of people who I believe are involved in the Joeyisalittlekid hate group. On Monday, I will be asking Judge Bob Carroll to replace the name of "Joey Does" with the names of these people, if they are not already named Defendants.

I do not want to trouble any innocent people. I would like to give anyone who I have named the opportunity to provide a sworn, notarized affidavit stating that you are not one of the Joeyisalittle kid users. If you have been wrongfully named, you should provide an affidavit.

If you have posted on Joeyisalittlekid.blogspot.com but I have identified you by a screen name that is not correct, simply provide a sworn affidavit with your name, address, email, and phone with this statement:

"I do not now and never have posted anything on the internet using any version of the name _____."

If you were never involved in Joeyisalittlekid, but I have stated that I thought you had been, simply provide a sworn affidavit with your name, address, email, and phone with these statements:

AFFIDAVIT OF _____ DATED FEBRUARY ____, 2014

I, _____, the undersigned, hereby declare under penalty of perjury:

1. I am over the age of 21, am competent to testify, and have personal knowledge of the matters stated herein. I provide this affidavit to be used in this matter and in any other legal proceeding.

2. My address is _____. My telephone is _____.
My email is _____.

3. I have never visited Joeyisalittlekid@blotspot.com.

4. I have never posted or submitted a message of any kind to Joeyisalittlekid@blogspot.com under any screen name.

FURTHER SAITH AFFIANT NOT. I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____ day of February 2014.

VERIFICATION

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, _____, who after being duly sworn deposes and states that he is authorized to make this verification on behalf of himself and that the facts alleged in the foregoing AFFIDAVIT OF _____ DATED _____ are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This ____ day of February 2014.

Printed Name: _____

Sworn and subscribed before me this ____ day of February 2014.

Notary Public

Please go to a bank or some such place and get it notarized. Email a copy to nobodies@att.net, and mail the original to William M. Windsor, PO Box 150325, Dallas, TX 75315

Exhibit

B

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

ORDER GRANTING PLAINTIFF'S MOTION
TO NAME BETSI BENDIX AS A PARTY

On February 24, 2014, Plaintiff William M. Windsor ("Windsor" or "Plaintiff") filed a MOTION TO NAME BETSI BENDIX AS A PARTY.

The Court considered the motion and Rule 28 of the Texas Rules of Civil Procedure.

IT IS HEREBY ORDERED that,

- a. The PLAINTIFF'S motion is granted;
- b. Betsi Bendix is added as a Defendant.

IT IS SO ORDERED this ____ day of _____, 2014,

Honorable Bob Carroll
Judge, 40th Judicial District Court
Ellis County, Texas

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

MOTION TO NAME MELANIE WHITE AS A PARTY

William M. Windsor ("Windsor" or "Plaintiff") hereby files this MOTION TO NAME MELANIE WHITE AS A PARTY.

1. Melanie White is believed to be one of the Joey Does who needs to be a named defendant. Extensive defamation and participation in the conspiracy is provided in the articles from Joeyisalittlekid.blogspot.com filed with this Court as an exhibit to the MOTION FOR TEMPORARY RESTRAINING ORDER. Melanie White is believed to be "Yappy," one of the most vicious of the users on Joeyisalittlekid.blogspot.com

2. The Plaintiff called Melanie White to ask her to admit or deny that she is one of the people who publish on Joeyisalittlekid.blogspot.com, and she did not return the call.

3. The Plaintiff also published a request for affidavits denying involvement. A true and correct copy of this published notice is attached as Exhibit A hereto.

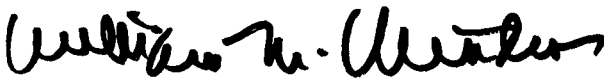
4. Pursuant to Rule 28 of the Texas Rules of Civil Procedure, the Plaintiff hereby moves the Court to substitute the name of Melanie White as one of the named defendants with an address of 612 N Rusk, Weatherford, TX 76086.

5. A proposed order is attached hereto as Exhibit B.

WHEREFORE, the Plaintiff respectfully requests an order:

- a. that this MOTION is granted;
- b. that Melanie White be substituted as one of the named Defendants; and
- c. that this Court grant any other relief that this Court deems just and proper.

Submitted this 24th day of February, 2014,



William M. Windsor

PO Box 150325, Dallas, TX 75315

email: nobodies@att.net, Phone: 770-578-1094

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing MOTION TO NAME MELANIE

WHITE AS A PARTY to each Defendant:

JOEYISALITTLEKID
Secretary of State - State of Texas
1100 Congress, Capitol Bldg. Room 1E.8
Austin, Texas 78701

Joeyisalittlekid.blogspot.com
c/o Google
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Megan Van Zelfden
6445 Love Drive #2041
Irving, TX 75034

Brannon Bridge
c/o John M. Perkins III
201 E Main Street – Suite 209, Waxahachie, TX 75165
Phone: 469-765-6516

email: branbri@aol.com.

Curtis Butler
4604 Lilac Ln, Victoria, TX 77904
email: balchspringsbeacon@gmail.com

Sean D. Fleming
c/o Barbara L. Hachenburg
Germer Attorneys at Law
Three Allen Center, 333 Clay Street, Suite 4950, Houston, TX 77002
Phone: 713-650-1313
Fax: 713-739-7420
email: bhachenburg@germer.com

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Kellie McDougald
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Kemp, TX 75143

Brandy Owen
4074 Kaspar Lane, Ennis, TX 75119

Michelle Stilipec
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Sean M. Boushie
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406-721-9700

email: alison@montanalawyer.com

Allie Overstreet
1208 N Main, Higginsville, Missouri 64037
email: loverstreet09@yahoo.com

Claudine Dombrowski
c/o Kansas Secretary of State's Safe at Home Program
Memorial Hall, First Floor, 120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

American Mothers Political Party
c/o Secretary of State - State of Kansas
120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

Google, Inc.
Shannon Zmud Teicher
Jackson & Walker
901 Main Street, Suite 6000, Dallas, TX 75202
214-953-6000
steicher@jw.com

This 24th day of February, 2014.



William M. Windsor

PO Box 150325, Dallas, TX 75315
Email: nobodies@att.net
Phone: 770-578-1094

Exhibit

A

Bill Windsor

February 20

IMPORTANT MESSAGE TO JOEYISALITTLEKID AND THOSE WHO WE BELIEVE WE
HAVE IDENTIFIED

I have recently named a number of people who I believe are involved in the Joeyisalittlekid hate group. On Monday, I will be asking Judge Bob Carroll to replace the name of "Joey Does" with the names of these people, if they are not already named Defendants.

I do not want to trouble any innocent people. I would like to give anyone who I have named the opportunity to provide a sworn, notarized affidavit stating that you are not one of the Joeyisalittle kid users. If you have been wrongfully named, you should provide an affidavit.

If you have posted on Joeyisalittlekid.blogspot.com but I have identified you by a screen name that is not correct, simply provide a sworn affidavit with your name, address, email, and phone with this statement:

"I do not now and never have posted anything on the internet using any version of the name _____."

If you were never involved in Joeyisalittlekid, but I have stated that I thought you had been, simply provide a sworn affidavit with your name, address, email, and phone with these statements:

AFFIDAVIT OF _____ DATED FEBRUARY ____, 2014

I, _____, the undersigned, hereby declare under penalty of perjury:

1. I am over the age of 21, am competent to testify, and have personal knowledge of the matters stated herein. I provide this affidavit to be used in this matter and in any other legal proceeding.

2. My address is _____. My telephone is _____.
My email is _____.

3. I have never visited Joeyisalittlekid@blotspot.com.

4. I have never posted or submitted a message of any kind to Joeyisalittlekid@blogspot.com under any screen name.

FURTHER SAITH AFFIANT NOT. I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____ day of February 2014.

VERIFICATION

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, _____, who after being duly sworn deposes and states that he is authorized to make this verification on behalf of himself and that the facts alleged in the foregoing AFFIDAVIT OF _____ DATED _____ are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This ____ day of February 2014.

Printed Name: _____

Sworn and subscribed before me this ____ day of February 2014.

Notary Public

Please go to a bank or some such place and get it notarized. Email a copy to nobodies@att.net, and mail the original to William M. Windsor, PO Box 150325, Dallas, TX 75315

Exhibit

B

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

ORDER GRANTING PLAINTIFF'S MOTION
TO NAME MELANIE WHITE AS A PARTY

On February 24, 2014, Plaintiff William M. Windsor ("Windsor" or "Plaintiff") filed a MOTION TO NAME MELANIE WHITE AS A PARTY.

The Court considered the motion and Rule 28 of the Texas Rules of Civil Procedure.

IT IS HEREBY ORDERED that,

- a. The PLAINTIFF'S motion is granted;
- b. Melanie White is added as a Defendant.

IT IS SO ORDERED this ____ day of _____, 2014,

Honorable Bob Carroll
Judge, 40th Judicial District Court
Ellis County, Texas

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

MOTION TO NAME DIANE GOCHIN AS A PARTY

William M. Windsor ("Windsor" or "Plaintiff") hereby files this MOTION TO NAME DIANE GOCHIN AS A PARTY.

1. Diane Gochin is believed to be one of the Joey Does who needs to be a named defendant. Extensive defamation and participation in the conspiracy is provided in the articles from Joeyisalittlekid.blogspot.com filed with this Court as an exhibit to the MOTION FOR TEMPORARY RESTRAINING ORDER. Diane Gochin is one of the screen names on Joeyisalittlekid.blogspot.com, and it is suspected that she posted under aliases as well. In addition, Diane Gochin conspired with Defendant Lisa Jones to file a fraudulent trademark filing in an attempt to steal the trademark rights to the Plaintiff's documentary film.

2. Pursuant to Rule 28 of the Texas Rules of Civil Procedure, the Plaintiff hereby moves the Court to substitute the name of Diane Gochin as one of the named defendants with an address of 931 Thrush Lane. Huntingdon Valley, Pennsylvania 19006.

3. A proposed order is attached hereto as Exhibit A.

WHEREFORE, the Plaintiff respectfully requests an order:

- a. that this MOTION is granted;
- b. that Diane Gochin be substituted as one of the named Defendants; and
- c. that this Court grant any other relief that this Court deems just and proper.

Submitted this 24th day of February, 2014,

A handwritten signature in black ink, appearing to read "William M. Windsor". The signature is fluid and cursive, with a horizontal line drawn underneath it.

William M. Windsor

PO Box 150325, Dallas, TX 75315

email: nobodies@att.net, Phone: 770-578-1094

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipecc, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing MOTION TO NAME DIANE GOCHIN

AS A PARTY to each Defendant:

JOEYISALITTLEKID
Secretary of State - State of Texas
1100 Congress, Capitol Bldg. Room 1E.8
Austin, Texas 78701

Joeyisalittlekid.blogspot.com
c/o Google
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Megan Van Zelfden
6445 Love Drive #2041
Irving, TX 75034

Brannon Bridge
c/o John M. Perkins III
201 E Main Street – Suite 209, Waxahachie, TX 75165
Phone: 469-765-6516

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Curtis Butler
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Sean D. Fleming
c/o Barbara L. Hachenburg
Germer Attorneys at Law
Three Allen Center, 333 Clay Street, Suite 4950, Houston, TX 77002
Phone: 713-650-1313
Fax: 713-739-7420
email: bhachenburg@germer.com

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Lisa Jones
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832-788-4405

Sam Round
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email: sroundII@bellsouth.net

Kellie McDougald
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Kemp, TX 75143

Brandy Owen
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Email: jmstilipec@hotmail.com

Sean M. Boushie
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email: missoulagloryholefun@yahoo.com

Sean M. Boushie
c/o Alison Garab
Sullivan, Tabaracci & Rhoades
1821 S Avenue West, Missoula, MT 59801
406-721-9700

email: alison@montanalawyer.com

Allie Overstreet
1208 N Main, Higginsville, Missouri 64037
email: loverstreet09@yahoo.com

Claudine Dombrowski
c/o Kansas Secretary of State's Safe at Home Program
Memorial Hall, First Floor, 120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

American Mothers Political Party
c/o Secretary of State - State of Kansas
120 SW 10th Avenue, Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

Google, Inc.
Shannon Zmud Teicher
Jackson & Walker
901 Main Street, Suite 6000, Dallas, TX 75202
214-953-6000
steicher@jw.com

This 24th day of February, 2014.



William M. Windsor

PO Box 150325, Dallas, TX 75315
Email: nobodies@att.net
Phone: 770-578-1094

Exhibit

A

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

ORDER GRANTING PLAINTIFF'S MOTION
TO NAME DIANE GOCHIN AS A PARTY

On February 24, 2014, Plaintiff William M. Windsor ("Windsor" or "Plaintiff") filed a MOTION TO NAME DIANE GOCHIN AS A PARTY.

The Court considered the motion and Rule 28 of the Texas Rules of Civil Procedure.

IT IS HEREBY ORDERED that,

- a. The PLAINTIFF'S motion is granted;
- b. Diane Gochin is added as a Defendant.

IT IS SO ORDERED this ____ day of _____, 2014,

Honorable Bob Carroll
Judge, 40th Judicial District Court
Ellis County, Texas

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

AMENDED MOTION FOR LEAVE TO AMEND VERIFIED PETITION

TO ADD GOOGLE, INC. AS A PARTY

William M. Windsor ("Windsor" or "Plaintiff") hereby files this AMENDED MOTION FOR LEAVE TO AMEND VERIFIED PETITION TO ADD GOOGLE, INC. AS A PARTY.

1. Google, Inc. needs to be added as a named defendant.
2. Google, Inc. operates a variety of businesses on the Internet worldwide. It builds various tools that enable users to connect, share, discover, and communicate with each other on mobile devices and computers. It has millions of users worldwide and offers those with an account a variety of potentially beneficial ways to interact with friends and the website itself. Google provides a way for users to stay connected with those around them and what's happening in the world at any given time. It's also a way to direct others to events or products. Businesses and other public figures also use Google as a means of promotion. Google profits by selling

advertising that appears with its content. Google licenses content from others that it displays on its websites.

3. The PLAINTIFF has become the victim of stalking, harassment, defamation, libel, slander, invasion of privacy, bogus criminal charges against him, and threats (including some death threats). The PLAINTIFF has been followed online and has been contacted online for the purpose of harassing and intimidating him. Stalkers have attempted to terrify, threaten, harass, annoy, and offend the PLAINTIFF with lewd and profane language, claims of lewd and lascivious acts, threats to inflict physical harm, and more. GOOGLE has been used for much of this, and GOOGLE has refused to honor its terms and stop this activity when notified by the PLAINTIFF.

4. The Stalkers have repeatedly violated the PLAINTIFF's privacy rights and copyright by using photos and videos of him and/or his family that they have no legal right to use. GOOGLE has allowed this use despite online and written notice from the PLAINTIFF.

5. Stalkers have created GOOGLE pages about the PLAINTIFF containing defamatory content, including some that utilize the PLAINTIFF's name and names associated with the PLAINTIFF.

6. There are many lies, libelous, slanderous, defamatory statements published online on GOOGLE about the PLAINTIFF by a host of people, many of who use fake names.

7. GOOGLE has caused severe emotional distress through its actions designed to damage the PLAINTIFF. GOOGLE ignored its legal responsibilities, violated the law, and damaged the PLAINTIFF intentionally.

8. The PLAINTIFF seeks to include GOOGLE in its causes of action for:
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS; TORTIOUS INTERFERENCE

WITH CONTRACT OR BUSINESS EXPECTANCY; TORTIOUS INTERFERENCE WITH A PROSPECTIVE BUSINESS RELATIONSHIP; CONSPIRACY.

9. A cause of action for intentional infliction of emotional distress; although the claim is not barred by section 230 (because it is consistent with the [Communications decency] Act). (See *Milo v. Martin*, 311 S.W.3d 210 (Tex.App. Dist.9 04/29/2010).)

10. The PLAINTIFF seeks to add fraud as a cause of action against GOOGLE as well as actions for negligence and gross negligence.

11. GOOGLE represented to the PLAINTIFF that important facts were true, including (1) that GOOGLE should be used to promote the PLAINTIFF'S movie; (2) that GOOGLE would comply with its terms of service, (3) that GOOGLE would operate legally, (4) that GOOGLE would protect the PLAINTIFF from wrongdoing on its services, (5) that GOOGLE would respond appropriately to the facts and evidence provided by the PLAINTIFF.

12. GOOGLE's representations were false. GOOGLE knew that the representations were false when made, or that the representations were made recklessly and without regard for the truth. GOOGLE intended that the PLAINTIFF rely on the representations. The PLAINTIFF reasonably relied on GOOGLE's representations. The PLAINTIFF was harmed. The PLAINTIFF'S reliance on GOOGLE's representations was a substantial factor in causing harm to the PLAINTIFF.

13. Texas law requires proof of three familiar elements to sustain a cause of action for negligence: (1) a legal duty owed by one party to another, (2) a breach of that duty, and (3) damages proximately caused by the breach. GOOGLE had a duty to the PLAINTIFF; they breached that duty; and damages were caused by that breach.

14. The PLAINTIFF also seeks to add defamation claims against GOOGLE. The PLAINTIFF will argue that GOOGLE must be held responsible for the defamation published on its web sites because GOOGLE licensed the content and then violated its terms and allowed the defamation to continue after being advised that it existed. The federal Communications Decency Act law was not intended to allow Google and other Internet Service Providers to aid and abet the destruction of people's lives through outlandish defamation and infliction of emotional distress.

"If a malicious website operator intentionally and unreasonably refuses to delete an anonymous third-party's obviously defamatory statement, a claim based on an intentional tort may be asserted in the appropriate circumstances against the operator under Texas law." (*Milo v. Martin*, 311 S.W.3d 210 (Tex.App. Dist.9 04/29/2010).)

"...we find no reported Texas opinion that has addressed whether section 230 preempts Texas defamation law relating to situations involving internet service providers who provide access to defamatory third-party created content...." (*Milo v. Martin*, 311 S.W.3d 210 (Tex.App. Dist.9 04/29/2010).)

15. Exhibit A hereto is a proposed order.

WHEREFORE, the Plaintiff respectfully requests an order:

- a. that this MOTION is granted;
- b. that the PLAINTIFF may amend the First Amended Verified Petition to add GOOGLE, INC. as a party and to add causes of action; and
- c. that this Court grant any other relief that this Court deems just and proper.

Submitted this 2nd day of February, 2014,



William M. Windsor
PO Box 150325 * Dallas, TX 75315
Email: nobodies@att.net, Phone: 770-578-1094

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that I will serve the foregoing AMENDED MOTION FOR LEAVE TO
AMEND VERIFIED PETITION TO ADD GOOGLE, INC. AS A PARTY to each Defendant:

JOEYISALITTLEKID
Secretary of State
State of Texas
1100 Congress
Capitol Bldg. Room 1E.8
Austin, Texas 78701

Joeyisalittlekid.blogspot.com
c/o Google
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive
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Megan Van Zelfden
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Brannon Bridge
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Waxahachie, TX 75065
email: branbri@aol.com.

Curtis Butler
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Victoria, TX 77904

Sean D. Fleming
c/o Barbara L. Hachenburg
Germer Attorneys at Law
Three Allen Center
333 Clay Street, Suite 4950
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Phone: 713-650-1313
Fax: 713-739-7420
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Albert J. Fiorini
505 Promontory Drive West
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email: newportbay@aol.com

Lisa Jones
5121 Pearson Rd
Santa Fe, TX 77517
832-788-4405

Sam Round
6733 Highway 155 N
Stockbridge, GA 30281
email: sroundII@bellsouth.net

Kellie McDougald
703 E 11th St
Kemp, TX 75143

Brandy Owen
4074 Kaspar Lane
Ennis, TX 75119

Michelle Stilipec
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Fort Meade, Maryland 20755
Email: jmstilipec@hotmail.com

Sean M. Boushie
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Stevensville, Montana 59870
email: missoulagloryholefun@yahoo.com

Sean M. Boushie
c/o Alison Garab
Sullivan, Tabaracci & Rhoades
1821 S Avenue West
Missoula, MT 59801
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email: alison@montanalawyer.com

Allie Overstreet
c/o Matthew J. O'Connor
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521 Walnut Street
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816-842-1111
Email: mjoc@workingforjustice.com

Claudine Dombrowski
c/o Kansas Secretary of State's Safe at Home Program
Memorial Hall, First Floor
120 SW 10th Avenue
Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

American Mothers Political Party
c/o Secretary of State
State of Kansas
120 SW 10th Avenue
Topeka, KS 66602-1594
email: safeathome@sos.ks.gov -- email: angelfury@live.com

Google, Inc.
Shannon Zmud Teicher
Jackson & Walker
901 Main Street, Suite 6000
Dallas, TX 75202
214-953-6000
steicher@jw.com

This 2nd day of February, 2014.

A handwritten signature in black ink, appearing to read "William M. Windsor", written over a horizontal line.

William M. Windsor

PO Box 150325 * Dallas, TX 75315

Email: nobodies@att.net

Phone: 770-578-1094

Exhibit

A

CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com , Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

ORDER GRANTING PLAINTIFF'S MOTION FOR LEAVE TO AMEND VERIFIED

PETITION TO ADD GOOGLE, INC. AS A PARTY

1. The PLAINTIFF filed a motion for leave to add GOOGLE, INC. as a party.
2. The Court considered the papers and arguments, and the Court finds that the

PLAINTIFF'S motion should be granted.

IT IS HEREBY ORDERED that,

- a. the PLAINTIFF'S motion is granted;
- b. the PLAINTIFF may amend the First Amended Verified Petition to add
GOOGLE, INC. as a party and add causes of action.

IT IS SO ORDERED this ____ day of _____, 2014,

Honorable Bob Carroll
Judge, 40th Judicial District Court
Ellis County, Texas

Exhibit

D

Case 9:13-mc-00011-DLC Document 2 Filed 12/02/13 Page 1 of 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

FILED

DEC 02 2013

Clerk, U.S. District Court
District Of Montana
Missoula

MCV 13-00011-M-DLC

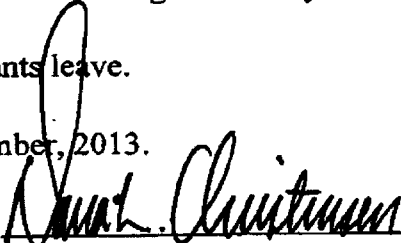
IN RE: WILLIAM WINDSOR.

ORDER

On November 20, 2013, William Windsor sent a letter to the undersigned seeking permission to file a civil complaint and two petitions for temporary orders of protection. Mr. Windsor seeks this permission pursuant to an order issued on July 15, 2011 by Judge Thomas W. Thrash, United States District Court Judge in the Northern District of Georgia which permanently enjoined Mr. Windsor from initiating any proceeding in any court or agency without first obtaining leave of a federal district court in the district in which the action is to be filed. *See Windsor v. Hatten*, Case No. 1:11-CV-1923-TWT, slip op. At 2-3 (N.D.Ga. July 15, 2011, copy attached hereto).

To the extent this Court has jurisdiction to give or deny leave to Mr. Windsor to file his three actions, it grants leave.

DATED this 2nd day of December, 2013.


Dana L. Christensen, Chief Judge
United States District Court

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1105468959 [Date=12/2/2013] [FileNumber=1274955-0
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221a6a0e5635563066c3e917d6e3eb51cc748bfb7476fa362efc689cfe98c]]

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 11&DVH13 DUFISDQW11-XGJH1' DQD111&KUVH1QVH11GFB11QJV# P V&KVERXWURY1
 111 RQ1&DVH13 DUFISDQW1
 111 R11 RWFH16 HQW1

0 HVVDJH1G111111111111# P V&KVERXWURY!
 6 XEMFWS FVYWA1Q1&DVH111111P F111111' /& 1Q15 H11: 11DP 1: 1QVRL2 UGHU
 Content-Type: text/html

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U.S. District Court

District Of Montana

Notice of Electronic Filing

The following transaction was entered on 12/2/2013 at 4:03 PM MST and filed on 12/2/2013

Case Name: In Re: William Windsor

Case Number: 9:13-mc-00011-DLC

Filer:

Document Number: 2

Docket Text:

ORDER. To the extent this Court has jurisdiction to give or deny leave to Mr. Windsor to file his three actions, it grants leave. Signed by Judge Dana L. Christensen on 12/2/2013. Mailed to Windsor. (TAG,)

9:13-mc-00011-DLC Notice has been electronically mailed to:

9:13-mc-00011-DLC Notice has been delivered by other means to:

William Windsor
 110 E Center St. #1213
 Madison, SD 57042

The following document(s) are associated with this transaction:

Document description:Main Document

Exhibit

E

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

In re: William M. Windsor § NO. _____
 §
 § ORDER

On November 21, 2013, William M. Windsor sent a letter to the undersigned seeking permission to file a civil complaint. Mr. Windsor sent another letter and documents to the undersigned on February 24, 2014 seeking a written order as requested by the 40th Judicial District Court in Ellis County, Texas.

William M. Windsor seeks this permission pursuant to an order issued on July 15, 2011 by Judge Thomas W. Thrash, United States District Court Judge in the Northern District of Georgia. The alleged order permanently enjoins William M. Windsor from initiating any proceeding in any court without first obtaining leave of a federal district court in the district in which the action is to be filed.

To the extent this Court has jurisdiction to give or deny leave to William M. Windsor to file, it grants leave.

Dated this ____ day of _____, 2014,

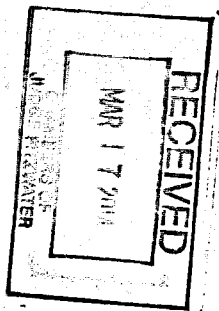
Sidney Fitzwater, Chief Judge
United States District Court

Exhibit

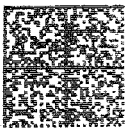
F

William M. Windsor
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